

Docket: ED-2020-SCC-0021

Application and Employment Certification for Public Service Loan Forgiveness

Comment On: ED-2020-SCC-0021-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Agency Information Collection Activities; Comment Request; Application and Employment Certification for Public Service Loan Forgiveness

Document	Submitter Name	Comment	Response
ED-2020-SCC-0021-0004	Name: Matthew Austin	<p>This is *much* better--starting off by having us indicate to what purpose we believe this form is put to use will be very helpful, as previously the ECF and the PSLF application were nearly indistinguishable.</p> <p>I do think that the paperwork-hours accounting given in the supporting document lowballs the true time it takes to assemble documents and complete paperwork. Borrowers have to provide ten years' employment information. Either they're frequently (Ed suggests annually) submitting ECFs at, say, 0.25 hours each for ten years, yielding 2.5 hours; or they're compiling everything all together for one submission. Having recently done that, I will attest it takes more than half an hour--somewhere in the 2-5 hrs range would be a more honest assessment. (It only takes one employer who's hard to track down/get information from to eat up more than half an hour!)</p>	<p>We understand that, for borrowers who do not submit forms annually, that the time it may take to complete a full 10 years of employment certification, it may take more than 0.25 hours. We also understand that it may take some borrowers longer than 0.25 hours to have their employer certify their employment. However, the number presented is an annualized average. This means that the burden for 10 years of employment certification is spread out over the course of 10 years. It also means that it is an average, which accounts for outlying cases where employment certifications take more time than other cases but reflect most borrower's experience. We believe that 0.25 hours is an accurate average, based on user testing and Departmental data concerning usage of the PSLF Help Tool.</p>
ED-2020-SCC-0021-0005	Name: Pamela Garcia	<p>Not sure if this is relevant to this new regulation...</p> <p>Please ensure that public service student loan forgiveness applies to parent loans taken for children as well, with forgiveness qualifications including student or parent who work in public service.</p>	<p>This comment is outside the scope of the request for comment, which is limited to a proposed new form for PSLF and TEPSLF. However, PSLF and TEPSLF were created by Congress, and the statute that created both programs does not support providing PSLF or TEPSLF to parent PLUS borrowers based on student's qualifying service.</p>
ED-2020-SCC-0021-0006	Name: Trevor Roberts Address: Apex, NC, 27502 Email: trevor.e.roberts@gmail.com	<p>Borrowers are 1) burdened by the process of having to track down multiple employers across LEAs, gathering paperwork that gov already has through tax returns. 2) having to stay abreast of any programmatic changes in applications or repayment options and 3) continuingly pay their loan obligations all while serving the public good. It would seem that the DOE's is most concerned with the payment and not the service. Simplify the whole process by using tax information or W2s to verify employment and be proactive to assist borrowers who could have some portion or all debt forgiven. Regardless of payment options, move to</p>	<p>Thank you for the comment. We understand and agree that the use of, in particular, W-2 information could be helpful in certifying employment and lessening the burden of certifying employment. However, because available data does not represent the exact dates of an individual's employment, the only conclusion that could be drawn is that the borrower was employed at some point during a calendar year. Again, while this may be useful in lessening burden and simplifying certain</p>

		qualify ALL public service workers.	processes, employment dates would need to continue to be certified.
ED-2020-SCC-0021-0007	Name: Kristi Beck Address: AZ,	<p>This does not go far enough. There is so much more that could be done to improve this program.</p> <ol style="list-style-type: none"> 1. Rather than using income from the last year to determine payments over the last 10 years, look at income and family size for the first ten years the applicant worked in public service. Determine the full amount the applicant should have paid each year under income based repayment. Then determine the total amount paid (excluding late payments) during years where the applicant worked in public service. If the amount paid is greater than the amount they should have paid, the applicant should be granted loan forgiveness. 2. Stop penalizing applicants who made payments in months when their accounts were in forbearance, applicants who paid more than was due on their bill some months, and applicants who made payments in months when no bill was generated. Applicants who did the responsible thing by attempting to pay down their debt and reduce the amount of outstanding interest on their loans should not be penalized. All payments that were made on-time while the account was not in default should be considered, even if the payments were not technically "due" during the month when they were paid. 3. The private contractors overseeing this program should be accountable for providing better customer service. When people apply they should be informed that their application has been received get an idea of how long the evaluation process is expected to take and when they will get a decision. 	<p>All comments are outside the scope of the request for comment, which are limited to the form. However, responses are below.</p> <ol style="list-style-type: none"> 1. We believe this comment is related to TEPSLF and that it is in reference to the requirement that a borrower can only qualify if the amount the borrower paid 12 months prior to applying for TEPSLF and the last amount the borrower paid prior to applying for TEPSLF are at least as much as what the borrower would have paid under an income-driven repayment plan. This requirement was created by Congress and cannot be changed by the Department. 2. We are in the process of changing our practices to allow borrowers who have made prepayments such that they are "paid ahead" to receive credit towards PSLF and TEPSLF. 3. We take our oversight responsibility seriously and are continually improving such practices.
ED-2020-SCC-0021-0008	Name: Donna Baker-Geidner Address: Fresno, CA, 93706 Email: djgeidner@sbcglobal.net	<p>I have had trouble getting "credit" for all the payments already made. Where and HOW do I ensure that PSLF is considering the 10 years of payments I already made when assessing the forgiveness?</p>	<p>This comment is outside the scope of the request for comment, which are limited to the form.</p>
ED-2020-SCC-0021-0009	Name: Michael Womersley Address: Jackson, ME, 04921 Email: mwomersley@unity.edu	<p>We are college teachers at a qualifying 501 (c) (3) college with 18 and 15 years of payments respectively. We qualify for TEPSLF. We fell into a black hole/endless data loop with FedLoan because we had used a spousal consolidation loan from Direct Loans. Apparently the computer and call center operators couldn't handle the consolidation situation, or the fact that we both worked for the same institution. Most likely, our</p>	<p>This comment is outside the scope of the request for comment, which are limited to the form.</p>

		<p>situation simply didn't match available computer data input fields. In a Kafkaesque limbo, I kept making regular, on-time payments each month, while submitting endless forms, only to be denied over and over again by FedLoan for not having "eligible loans" (because my spouse was the first borrower). They also miscounted the qualifying payments several times and denied us for that a couple times. Luckily, I kept all our bill stubs back to 2002 when payments began, so could prove that payments had been made. The endless loop of FedLoan denials and requests for new ECFs and PSLF/TEPSLF applications only ended when we complained to the ED Ombudsman, sending in .pdfs of the bill stubs. We then were finally given a responsive associate at FedLoan, who found a pathway through the red tape for us. It still took nearly two years. We are now on track for forgiveness, but the anxiety caused and time consumed were considerable. I'll never get those worried hours and the sleepless nights back. This new form is a great improvement, but it still doesn't seem to address the dysfunctional looping that occurs when there is a spousal consolidation loan. It's clearly written for individuals, not couples. I'm not confident that the full scope of the problem has been addressed.</p>	
ED-2020-SCC-0021-0010	<p>Name: E Dana Address: Syracuse, New York, 13104 Submitter's Representative: self</p>	<p>I am 63 years young with \$30,000 in student loan debt. I was a Teacher of the Year, won fellowships and taught over 20 years on both the k-12 and college levels.</p> <p>Since all of my payments to my student loans and teaching in California before 2007 does not count toward a pension, social security , and working for federal grant programs like McNair Funded Trio EOP and Reach programs do not count, here I sit. When my Direct loans were took over by Navient , under their recommendation and advise, I was told to consolidate the 2 loans, those payments now do not count.</p> <p>I am now a working (Teaching in Special Education) widow with a disabled adult child who has to work for medical insurance coverage AND still paying student loans since 2001.</p> <p>I have been a volunteer NYS paramedic, and was dedicated to enter teaching to serve our first generation college students with academic, economic and learning needs from economically deprived areas of society.</p> <p>I was turned down for the Teacher Forgiveness Program, Temporary</p>	<p>This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs were established by Congress and cannot be changed by the Department.</p>

		Public Service Loan Program. For over 20 years I have taught and served the public. Please streamline the program to forgive loans for people near retirement an opportunity not to pay student loans to their funerals.	
ED-2020-SCC-0021-0011	Name: Jennifer Holzman Address: Rockville, MD, 20850 Email: jennifer.holzman@nrc.gov	I am a proud Federal employee with almost 18 years of service. I have applied and been rejected from both PSLF and TEPSLF multiple times due to "not being enrolled in the correct repayment program." To my knowledge, the "correct" repayment program was never advertised when the loan forgiveness program started. I have paid my loan on time and in full every month and I believe that I should qualify for forgiveness given my record of federal service. I know there are many others in my situation. The Student Loan Forgiveness Program should benefit ALL public servants who have fulfilled the years of service required, REGARDLESS of what payment program they have been in. We would all appreciate a simplified form and full consideration of our requests. I would appreciate if someone from the Department could contact me to assist me in re-applying.	This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs were established by Congress and cannot be changed by the Department.
ED-2020-SCC-0021-0012	Name: Wendy Hathaway Address: Tampa, FL, 33613 Email: wendy.hathaway@gmail.com	I was directed towards a FFEL and consolidated and have been paying IBR for over 12 years while working in the public sector. Sallie Mae and my university financial officers were of zero help in explaining what I needed to do while being very clear about what my intentions were for my loan repayment. I have never missed a payment, never late, and always what I owed. If FFEL loans were to be included, I would have my loans paid off while working as a health science specialist at the Department of Veterans Affairs. I continue to think about working in the public sector so that I can afford my graduate school, which at the time I chose to work for the VA (a passion to serve those who served). I feel like I was cheated by a confusing and predatory financial aid system. Please consider adding FFEL payments to ANY Loan Forgiveness policy changes.	This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs, including that they are only available on Direct Loans, were established by Congress and cannot be changed by the Department.
ED-2020-SCC-0021-0013	Name: Serena Cookingham Address: Phoenix, AZ, 85042 Email: serena.cookingham@gmail.com	This is a step in the right direction. Combining the Employment Certification Form for PSLF, PSLF Application for Forgiveness, and the email procedure for TEPSLF into one application will help simplify things for borrowers. The ECF and Application for Forgiveness looked similar and borrowers were confused on which application they needed to send in. I like the "I request" portion at the top of section 2 that gives the borrower the option to select the reason for the request and whether they want a forbearance while the application is reviewed. The wording is easy to read and concise; which will help borrowers better understand	Thank you for your comments. TEPSLF was created by Congress. Once the funds for TEPSLF are expended, the program will end unless or until Congress appropriates more money for the program. If this does not occur, the form would be modified to eliminate nearly all references to TEPSLF.

		<p>the qualifications for PSLF and TEPSLF.</p> <p>When the current funding for TEPSLF is used, are there plans to create additional funding opportunities? Or will TEPSLF be discontinued and removed from this proposed application?</p>	
ED-2020-SCC-0021-0014	<p>Name: Jade East Address: Coeur D Alene, ID, 83815 Email: jadeeric@outlook.com</p>	<p>I would like to see changes made to Loan Forgiveness on behalf of Public Service. I have been working in Federally Qualified Health Centers for over 13 years. I called originally and had my loans put into the correct loan type and merged over 10 years ago so I could qualify. I just called the board after over 5 years of public service with the State of Washington and 13 years with Federally Qualified Health Centers. They told me I needed to revise my loans and wait another 10 years. They now want me to serve over 23 years in Federal Qualified Health Centers with almost 20 years of my life in public service to have my loans forgiven for a 10-year rule.</p>	<p>This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs were established by Congress and cannot be changed by the Department.</p>
ED-2020-SCC-0021-0015	<p>Name: Elizabeth Tidwell Address: Topeka, 66604 Email: libby.tidwell@gmail.com</p>	<p>Regarding the Supporting Statement, item 7, bullet #4: requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;</p> <p>I am unable to obtain proof in the form of checking account statements that I made on-time payments in 2009 while in the process of consolidating my loans to become eligible for PSLF. My bank's records don't go back that far and FedLoan doesn't have the records either. If the form would tell people to save proof in the form of bank statements that they made their payments on time it would help people like me.</p> <p>Regarding the section titled, "Loan Eligibility," 2nd paragraph, sentence #3: "In addition, if you made qualifying payments on a Direct Loan and then consolidate it into a Direct Consolidation Loan, you must start over making qualifying payments on the new Direct Consolidation Loan."</p> <p>Why? This was confusing to me when I was trying to consolidate my loans back then and it's still confusing.</p> <p>And wouldn't the TEPSLF apply in this case if someone was paying on Direct Loans from the time they graduated college?</p> <p>Some clarification on this would be helpful.</p>	<p>Regarding the comment concerning checking account statements, borrowers are not required to retain bank account statements to receive PSLF, as a clear record of payments is retained by all of a borrower's servicers. However, we are researching your request for PSLF and will respond directly.</p> <p>Regarding the comment on loan eligibility, the requirements for PSLF and TEPSLF were created by Congress, which requires that a borrower make 120 qualifying payments on the Direct Loan on which they are seeking forgiveness. When a borrower consolidates a loan (of any type) into a Direct Loan, the old loans are paid off, and the repayment obligation is now for a new Direct Consolidation Loan. Because the borrower has to make 120 qualifying payments on the Direct Loan on which the borrower is seeking PSLF or TEPSLF, the payments made on loans that were consolidated cannot be considered towards PSLF or TEPSLF on the Direct Consolidation Loan.</p>

ED-2020-SCC-0021-0016	Name: Anonymous Anonymous Address: Arlington, va,	Over the last four years I have applied for both programs. My first application was in 2016 for which I received a mailed denial. I then learned about TEPSLF and applied but in December 2018 was told the TEPSLF request was denied and I should apply to PSLF. I applied to PSLF in May 2019 and have still not received a response. Four years after my initial attempt, and two years after I reached ten years of public service and eligibility for forgiveness, I still do not have an answer. Consolidating the requests will help this neverending loop I have been stuck in. The next step will to provide an answer.	This comment is outside the scope of the request for comment, which are limited to the form.
ED-2020-SCC-0021-0017	Name: C Douglas	I agree with others this process is flawed, thank you for the fix. I've been making payments under a Direct Loan since August 2008 and was told I didn't qualify for an ICR plan. Now I suddenly qualify. My question or comment is why is it 12 months of payments in a correct payment plan and the "last payment" must be an equal amount. Do you want us to make 13 payments in the correct plan or 12, then apply under the TEPSLF program? Please be clear and concise so folks don't have to assume. Also consider telling people when rejecting them under the TEPSLF plan what they can do to qualify instead of "keep making payments and try to apply for PSLF", especially if they've made over 120 payments under a Direct Loan.	<p>This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs were established by Congress and cannot be changed by the Department.</p> <p>In particular, the provision of the law that the commenter is referencing is the requirement that a borrower can only qualify if the amount the borrower paid 12 months prior to applying for TEPSLF and the last amount the borrower paid prior to applying for TEPSLF are at least as much as what the borrower would have paid under an income-driven repayment plan. This does not require that the borrower be in a qualifying plan for both of those payments. Instead, it requires the borrower's actual payment to be of a certain amount, regardless of the plan the borrower is in.</p> <p>The commenter may be referencing the fact that, if borrowers fail to meet this requirement, they may change to an income-driven repayment plan for one year, reapply for TEPSLF, and necessarily meet the above-referenced requirement.</p>
ED-2020-SCC-0021-0018	Name: Mateo Sanchez Address: Costa Mesa, 92626 Email: 186 Brookline Lane, Costa Mess, CA	I was accepted into the PSLF loan forgiveness program in 2008. I am a public school teacher at a title 1 school. I have been teaching there continuously for 12 years. Beginning in 2008 , I made my payments on time, assuming that my payments would count toward my loan forgiveness. I called Fedloan in 2013 to check on the status of my loan forgiveness. They told me only seven payments counted toward my loan forgiveness because of paperwork I did not fill out. Needless to say I was crushed. I was not made aware of any new paperwork through email or	This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs were established by Congress and cannot be changed by the Department.

		paper mail. Since then all my paperwork has been impeccable. However, I feel it is wrong that I lost so many qualifying payments due to a form I was not made aware of. Is there anything I can do? Can I apply to the TEPSLF? Something needs to be done to right this wrong. Please let me know.	
ED-2020-SCC-0021-0019	Name: Meg M	I have worked in the public sector for 15 years and have always paid my student loan payment. Not until 5 years ago did I realize that FFEL Loans were not included in this plan. By then it was pointless to refinance into Direct Loans. I still owe 13k. Please consider including FFEL loans into the revision of this broken plan.	This comment is outside the scope of the request for comment, which are limited to the form. The requirements for the PSLF and TEPSLF programs, including that they are only available on Direct Loans, were established by Congress and cannot be changed by the Department.
ED-2020-SCC-0021-0020	Name: Apri Medina Address: Santa Cruz, CA, 95060 Email: apri@ucsc.edu	<p>The introductory paragraph of Section 2 is confusing in relation to the option of "I dont think I qualify for forgiveness but am asking to find out how many qualifying payments I have made." Can it be revised to be more clear? Since the form will result in a payment count either way, perhaps the text can be updated to read:</p> <p>"I request (1) that the U.S. Department of Education (the Department) determine how many qualifying payments I have made towards PSLF and TEPSLF, and (2) review and take action on my requests as selected below regarding payment count, or eligibility for PSLF/TEPSLF."</p> <p>Also, under the "I understand" clauses, number 5 does not address what happens to interest accrued if the borrower applies for forebearance while the review is underway. Can the language be expanded for clause 5 to be more specific about accrued interest/principal during forbearance and review? See example amended clause below.</p> <p>Example: " If I am eligible for forgiveness: 1) the amount forgiven will be the principal and interest that was due on my eligible Direct Loans when I made my final qualifying payment, and 2) any interest accrued during a forbearance will be cancelled. Any amount that I pay on those loans after I have made my final qualifying payment will be treated as an overpayment. I must continue to make payments on any of my other loans."</p>	<p>We thank the commenter for her comments. We have attempted to make both points more clear, but are constrained by space on the form and could not adopt the suggested text as provided.</p> <p>In particular, with respect to the comment about forbearance, because the entire remaining balance is retroactively forgiven as of the date the borrower made his or her final qualifying payment, both the forbearance and the interest that accrued during the forbearance never existed after the forgiveness is processed.</p>
ED-2020-SCC-0021-0021	Name: Betsy Mayotte Address: Plymouth, MA, 02360	General: Historically, such forms have used the phrase "I believe" rather than "I think" when referring to borrower declarations. We	

Email: betsy@freestudentloanadvice.org

recommend maintaining that format as a way to further discourage consumers from submitting these applications before doing their own at least preliminary research to determine if they are eligible.

Accepted.

Section 2

Comment:

In the first line of instructions, add a “the” as follows”

I request (1) that the U.S. Department of Education (the Department) determine whether I qualify for PSLF or the TEPSLF and discharge any qualifying loans that I have, and (2) if none of my loans qualify for PSLF or the TEPSLF when I submit this form, determine how many qualifying payments I have made towards PSLF and the TEPSLF.

Reason:

When spoken, users would state they qualified for Public Service Loan Forgiveness or the Temporary Extension of...

Rejected. While we appreciate the comment, and common parlance, TEPSLF as used here, and as noted above, is “Temporary Expanded PSLF.”

Comment:

Under the 4th checkbox, add the following language:

“If I indicated that I believe I qualify for forgiveness now, I want a forbearance while my application is being processed, but understand that periods of forbearance do not count towards forgiveness. Not checking this box will result in payments being due during the forgiveness review period. Any payments made beyond the 120 qualifying payments needed for forgiveness will be refunded to the borrower”

Reason:

Clarity. Many borrowers have anxiety over the possibility of extending the timeframe for forgiveness and will be reassured by the option to be able to continue to pay and knowing those extra payments will be refunded.

Rejected. We do not have sufficient space to add this text to the form. However, we have made this point clearer in Section 8, and will elevate this content in the online version of the form.

Comment:

Under 2, make the following edit

2. To qualify for forgiveness, I must be employed full-time by a qualifying employer when I apply for and ~~get~~ receive final approval.

for forgiveness.

Reason:

Clarity. Borrowers must be working full time for an eligible employer at the time they make all qualifying payments, at the time they apply for forgiveness and at the time the application is reviewed. "Getting" forgiveness is ambiguous and can be misinterpreted.

Rejected. We do not have sufficient space to add this text to the form.

Comment:

Make the following edit

3. By submitting this form, my federal student loans ~~held by the Department~~ may be transferred to FedLoan Servicing.

Reason:

Clarity. Borrowers generally don't understand what "held by the Department" means.

Rejected. The edit would make the form inaccurate, as the Department does not own all federal student loans.

Comment:

Add the following clarifying language

5. If I am eligible for forgiveness, the amount forgiven will be the principal and interest that was due on my eligible Direct Loans when I made my final qualifying payment. Any amount that I pay on those loans after I have made my final qualifying payment will be treated as an overpayment. I must continue to make payments on any of my other loans that have not been forgiven.

Reason:

Clarity

Rejected. We do not have sufficient space to add this text to the form.

Comment:

Add the following language

7. I understand that if I have evidence proving why my loans should have been approved for forgiveness, I may submit an appeal to FedLoan Servicing or via the Department of Education's complaint system

Reason:

To ensure borrowers understand the process to dispute inaccurate PSLF and TEPSLF denials

Rejected. We do not have sufficient space to add this text to the form.

Section Three

Comment:

We suggest adding clarifying instructions at the top of this section such as:

		<p><u>“Please provide the most recent employment information. If you have worked for multiple employers during the time of your making the 120 qualifying payments and have not previously submitted proof of this employment, please submit separate employment certification forms to cover each of these employers and time periods.”</u></p> <p>Reason: This section is confusing as it’s not clear whether the borrower should provide the full ten years of employment or just the most recent.</p> <p>Rejected. We do not have sufficient space to add this text to the form. However, this will be much clearer in the updated online version of the application.</p> <p>Section Eight</p> <p>Comment: We suggest adding the following language Full payments are payments on your Direct Loan in an amount that equals or exceeds the amount you are required to pay each month. If you make multiple, partial payments in a month and the total of those partial payments equals the required full monthly payment amount, those payments will count as one qualifying payment <u>provided all of the partial payments were made within 15 days of the due date.</u></p> <p>Reason: It is important the borrowers understand that the full monthly payment must be received within 15 days of the due date to be considered a qualifying PSLF or TEPSLF payment.</p> <p>Accepted.</p> <p>Comment: On page 2 of Section 8, in the 2nd paragraph under loan eligibility, add the following language: “If you are planning to consolidate your FFEL Program or Perkins Loan Program loans into a Direct Consolidation Loan to take advantage of PSLF and do not have any Direct Loans, do not submit this form until you have consolidated your loans <u>and have subsequently made 120 qualifying payments.</u>”</p> <p>Reason: The existing language makes it appear like a borrower can receive forgiveness immediately after consolidating – despite the prior explanation.</p> <p>Accepted.</p>	
ED-2020-SCC-0021-0022	<p>Name: Maggie Waller Address: phoenix, AZ, 85041 Email: maggie.waller@phoenix.edu</p>	<p>The questions under Section 2 should be written more assertively, with clear direction. Please consider the following revisions:</p> <p>Option 1 Revised: I want to certify my employment and/or confirm how many qualifying payments I have made toward PSLF.</p> <p>Option 2 Revised: I am submitting my application for forgiveness under</p>	<p>We have accepted the comments to revise the checkboxes in section 2 of the form.</p> <p>However, we cannot incorporate the full definitions of the eligibility criteria into or near these checkboxes due to spacing constraints. The online version of the form, which is being re-designed, will help borrowers</p>

		<p>PSLF right now because I have made 120 qualifying payments while working for a qualifying employer.</p> <p>ADD DEFINITIONS NEXT or SEE DEFINITIONS IN SECTION 6 for: Qualifying repayment plans for PSLF include the Revised Pay As You Earn (REPAYE) plan, the Pay As You Earn (PAYE) plan, the Income-Based Repayment (IBR) plan, the Income-Contingent Repayment (ICR) plan, the Standard Repayment plan with a maximum 10-year repayment period, and any other Direct Loan repayment plan if payments are at least equal to the monthly payment amount that would be required under the Standard Repayment plan with a 10-year repayment period.</p> <p>A Qualifying employer includes the government, a not-for-profit organization that is tax-exempt under Section 501(c)(3) of the Internal Revenue Code, or a private not-for-profit organization that provides certain public services. Serving in an AmeriCorps or Peace Corps position is also qualifying employment.</p> <p>Option 3 Revised: I am submitting my application for forgiveness under TEPSLF right now because I have made 120 TEPSLF qualifying payments while working for a qualifying employer.</p> <p>ADD DEFINITIONS NEXT or SEE DEFINITIONS IN SECTION 6 for: Qualifying repayment plans** for TEPSLF include the qualifying repayment plans for PSLF, as well as the Graduated Repayment Plan, Extended Repayment Plan, Standard Repayment Plan for Direct Consolidation Loans, and Graduated</p> <p>A Qualifying employer includes the government, a not-for-profit organization that is tax-exempt under Section 501(c)(3) of the Internal Revenue Code, or a private not-for-profit organization that provides certain public services. Serving in an AmeriCorps or Peace Corps position is also qualifying employment.</p> <p>Option 4 Revised: If I indicated that I am submitting my application for forgiveness now, I want a forbearance while my application is being processed but understand that periods of forbearance do not count towards forgiveness.</p> <p>**Qualifying repayment "pans" p.3 is spelled incorrectly</p>	<p>understand the eligibility criteria to assist users answering this question. Understand, though, that even if a user answers this question incorrectly, they will get forgiveness, if eligible, and a count of qualifying payments, if currently ineligible.</p>
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ED-2020-SCC-0021-0023	Name: Lucius Pham	<p>Section 3 - #8: Suggest adding, "If your employer is a part of the Federal government, include time during furloughs and partial or full government shutdowns."</p> <p>Section 2: Suggest making statements more assertive, combining the ECF/PSLF components, and adding checklist-type check boxes for the TEPSLF component. Example:</p> <p>A - I want to certify my employment and/or confirm the number of qualifying payments I have made toward PSLF. If I have reached 120 qualifying payments, this submission will substitute for my final application for forgiveness under PSLF.</p> <p>B - I am submitting my application for forgiveness under PSLF. I have made 120 qualifying payments.</p> <p>C - I am submitting my application for forgiveness under TEPSLF.</p> <p>i. I have done x.</p> <p>ii. I have done y.</p>	<p>We have revised the checkboxes to make them clearer about their intent. However, it should be noted that borrowers will no longer need to request a specific action. Each time they submit a form, they will be reviewed for PSLF and TEPSLF eligibility, and granted whichever one they may qualify for (with a preference for PSLF if they qualify for both). These checkboxes will do nothing more than help us understand whether the borrower believes he or she qualifies for forgiveness, so that we can tailor communications back to that borrower in the context of what they thought they were eligible for.</p>
ED-2020-SCC-0021-0024	Name: Deborah Cona Address: Billerica, MA, 01821 Email: segerfan4012@hotmail.com	<p>Couple of typos to clean up:</p> <p>Page 2. Item 13. Third sentence in first paragraph - "if you you" - eliminate one 'you'</p> <p>Page 5. Last paragraph - "when evaluating whether to chose" - should be 'choose'</p>	<p>Thank you. These changes have been incorporated into the updated version of the form.</p>
ED-2020-SCC-0021-0025	Name: Kenneth Polishchuk Address: Washington, 20002 Email: kpolishchuk@apa.org	<p>However, while we support this initial effort to make fixes in both programs, APA believes there are additional steps that could be taken to quickly address several other concerns with the department's management of PSLF and TEPSLF:</p> <ol style="list-style-type: none"> 1. Since 2018, Congress has appropriated close to \$800 million for TEPSLF, however a very small amount of that funding has been used to assist rejected borrowers.¹ We urge the department to expeditiously apply this money as Congress intended and are hopeful that the change to the application process will aid this effort. 2. We also encourage the department to consider ways to better 	<p>These comments are outside the scope of the request for comment. However, we are always striving to improve our administration of PSLF and TEPSLF, and have enhancements planned throughout 2020. With respect to the information on our website, that information was added back to our website in error and has been removed.</p>

¹ Danielle Douglas-Gabriel, "Education Dept. rejects vast majority of applicants for temporary student loan forgiveness program," The Washington Post, April 2, 2019. Retrieved from <https://www.washingtonpost.com/education/2019/04/03/education-dept-rejects-vast-majority-applicants-temporary-student-loan-forgiveness-program/>

		<p>correct for simple processing errors—such as enrolling in the wrong repayment plan and/or failing to consolidate necessary loans—without denying forgiveness, which causes borrowers much distress and undue financial harm. This could include reconsidering previously denied applications or providing notification to borrowers who had previously been wrongfully denied, to resubmit their applications.</p> <p>3. According to recent reporting,² although the department currently has a system for investigating complaints and making fixes related to PSLF, very few borrowers are aware of this process. Per the GAO data cited above, a portion of the forgiveness denials were due to mistakes made by loan servicers. In order to provide borrowers an avenue to resolve disputes, APA strongly urges the department to widely publicize this appeals process to all current and future PSLF and TEPSLF applicants.</p> <p>4. Finally, we ask the department to make a stronger effort to clarify, on its website, employment requirements for nonprofit organizations—which are qualifying employers for PSLF—by explicitly removing any mention of the “primary purpose” condition, as it was required to do by a February 2019 U.S. District Court ruling.³ This would increase transparency and further limit confusion associated with the program.</p>	
ED-2020-SCC-0021-0026	Name: Xavier Becerra	We believe this comment should be considered a control letter to the Secretary, in that it doesn't provide comments on the form.	
ED-2020-SCC-0021-0027	Name: Justin Draeger Address: Washington, DC, 20006 Email: policy@nasfaa.org	<p>That being said, we believe the form - and the borrowers who will use it - could profit from the following modifications.</p> <p>Certification Language</p> <p>This form lacks an option for borrowers who want to submit an Employment Certification Form solely to determine whether they are employed at an eligible employer and can begin making payments toward PSLF. We therefore believe the form should include a checkbox that reads something similar to, “I am submitting an employer certification for the first time”, or updating the current checkbox to read, “I don't think I qualify for forgiveness right now. I want to find out how many qualifying payments I have made, or I want to submit new or updated employment certification information”.</p>	

² Stacey Cowley, “The Student Loan Appeal Process the Government Doesn’t Tell You About,” The New York Times, February 17, 2020. Retrieved from <https://www.nytimes.com/2020/02/17/business/federal-student-loan-appeals.html>

³ American Bar Association v. United States Department of Education, case number 1:16-cv-02476 in U.S. District Court for the District of Columbia. Retrieved from <https://www.americanbar.org/content/dam/aba/uncategorized/GAO/20190222Opinion.pdf>

		<p>This option existed on the draft form as “I don't think I qualify for forgiveness right now, I just wanted to find out how many qualifying payments I have made” which would have functioned like an ECF does today. However, we have revised this text to make this clearer.</p> <p>Order of Information We believe the consolidated form should list the “I understand that:” portion of Section 2 first, before a borrower completing the form makes their request. This reordering would prompt the borrower to ensure they are aware of the requirements for loan forgiveness under this program before checking any of the boxes.</p> <p>This text is consistent on all of our loan servicing forms and so we decline to make the change. However, for borrowers who complete this form electronically, they will have a different, more enhanced experience that should enable them to know whether they should check one box versus another. It is also important to understand that even if a user answers this question incorrectly, they will get forgiveness, if eligible, and a count of qualifying payments, if not.</p>	
ED-2020-SCC-0021-0028	<p>Name: Bianca Singh Submitter's Representative: Bianca Singh Organization: National Education Association bsingh@nea.org</p>	<p>Dear Director,</p> <p>On behalf of the 3 million members of the National Education Association (NEA), we submit the following response to the U.S. Department of Education’s comment request on the proposed change to consolidate forms that borrowers must complete to receive Public Service Loan Forgiveness (PSLF) and Temporary Expanded PLSF (TEPSLF). Part of the bipartisan College Cost Reduction and Access Act of 2007, PSLF was created to encourage talented individuals to pursue careers in public service, such as education. We are pleased with the U.S. Department of Education’s proposal to consolidate the PSLF and TEPSLF’s application process in an effort to further improve implementation of the program and ensure public service professionals are able to receive appropriate debt relief.</p> <p>According to findings from the U.S. Government Accountability Office, between May 2018 and May 2019, the U.S Department of Education processed 54,000 requests for TEPSLF, 99 percent of which were denied; 71 percent of those denied were rejected because the borrowers had not completed the application for PSLF first. This is just one of the many administrative requirements that prevent successful processing of the PSLF and TEPSLF applications. We believe that combining the PSLF and TEPSLF applications into one form will make the application process less confusing and burdensome and will result in</p>	<p>Though outside the scope of this comment request, we have agreed with all of the GAO’s recommendations, which are the same as the NEA’s recommendations, and are working on implementing them.</p>

		<p>more borrowers receiving approval for student debt relief. Consolidating the application process also removes barriers for borrowers and can increase the recruitment and retention of educators of color. Black and Latino students who train to teach are more likely than their white peers to borrow from the federal government to pay for their undergraduate degrees and for graduate school, and they are more likely to struggle to repay their loans once they enter the profession. Improvements to PSLF,</p> <p>TEPSLF, and other programs that work to reduce the impacts of student debt also work to promote diversity within the education profession.</p> <p>Although we vigorously support the Department’s decision to combine the applications, we also believe that additional administrative changes are needed to improve the overall application process. We believe loan providers should be required to include TEPSLF information on their websites; the PSLF online help tool should include information about TEPSLF; and information on how to contest TEPSLF decisions should be outlined on the TEPSLF website and clearly stated in denial letters.</p> <p>We respectfully submit the above comments for consideration and urge the U.S. Department of Education to continue making improvements to PSLF, TEPSLF, and other programs that aim to reduce the negative impact of student debt that continues to burden millions of student borrowers each year.</p> <p>If we can provide additional information or answer any questions, please do not hesitate to contact NEA Senior Policy Analysts Bianca Singh at bsingh@nea.org or Antwan Perry at aperry@nea.org.</p>	
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