

ICR Number 1845-0110 – PUBLIC SERVICE LOAN FORGIVENESS (PSLF) & TEMPORARY EXPANDED PSLF (TEPSLF) CERTIFICATION & APPLICATION
(60D) Comment Response Table

Comment #	Commenter Name	Comment	FSA Response	Change to ICR or Form
0005	Kemia Himon	They should also expand those who worked in the field at for profit institution. I started working in Financial Aid at a for profit school. I wasn't aware that it would not have benefitted me. The school that I started my career is not closed. However the 3 years that I worked there does not qualify for forgiveness.	Thank you for your comment. The eligibility requirements of a qualifying employer were addressed through the negotiated rulemaking. This form reflects updates to those rules and cannot address program eligibility requirements.	none
0004	Elijah Root	I applied for PSLF and consolidated my loans through Great Lake. I then had to re-consolidated my loans under Fed Loans. They were then re-consolidated under MOHELA. I have served in the military since 2009 and commanders that were not in my Chain-of-Command during that time will not sign off on the forms needed to qualify for PSLF. If you transfer units it makes that process even harder. The ability to provide a DD-214 with dates served should be enough to qualify for PSLF.	Thank you for your comment regarding obtaining signatures to complete the PSLF Form as a member of the military. The issue is addressed with the new form in this Information Collection Request. If your military employer is unable to certify your employment, you can submit the form along with your DD-214 as certification of your dates of employment without the need for an authorized official's signature.	none
0006	Anonymous	On the application, I think you should have space for providing an explanation for why an Employer should be certified. I've worked for the same company, in the same building, doing the same job for 10 years but started with their 501c4, while working on everything to grow the 501c3 Foundation. Then I became an employee of it, and my time there has already been certified. You should also go by the IRS's definition of "Other Nonprofits" exempt organization types because the 501c4 I'm trying to have certified is classified as a social welfare organization. You should allow the studentaid.gov reps the ability to send messages to the department that	<p>Thank you for your comment. The PSLF form is only generated once the employer has been determined to be a qualifying employer.</p> <p>The opportunity to provide additional information regarding an employer's eligibility is available through the reconsideration process and in the PSLF Help Tool if an employer eligibility determination has not been made.</p>	none

ICR Number 1845-0110 – PUBLIC SERVICE LOAN FORGIVENESS (PSLF) & TEMPORARY EXPANDED PSLF (TEPSLF) CERTIFICATION & APPLICATION (60D) Comment Response Table

		<p>handles reconsideration cases. They don't even know the name of the department that certifies employers. I've been trying to get my employer certified for over a year now, and every time I call to find out anything on my reconsideration request, the studentaid.gov rep can't see anything except that it's still open. They have no information for me, and no estimated date for completion, so I have to keep calling, which is a huge waste of time & money for everyone. It would be an even more colossal waste of time if my request was denied over something missing that I could provide if only someone told me first. That's why there is such a ridiculous backlog.</p>		
007, 008, 009	CMA, CHA, TMA, THA	<p>We have real concerns that, notwithstanding the good work done through the Final Rule, the Application Materials will once again lead to an inadvertent exclusion of eligible physicians from PSLF in California and Texas and disadvantage our physicians and hospitals and their ability to care for underserved patients. It is vital to avoid such an unfair result and make minor, but important, corrections to the Application Materials to ensure full conformity with the Final Rule's new definition of "employee or employed."</p> <p>In defining "contracted organization," Section 7 explains that "if the direct employees of the contracted organization are in positions or providing services that, under State law, cannot be filled or provided by a direct employee of a qualifying employer, the Authorized Official of the qualifying employer can certify their employment as if those employees were direct</p>	<p>Thank you for your comment that the language on the form does not accurately reflect the new regulatory definition of "employee or employed". We agree that including the additional distinction of a "contracted organization" to the instructions of the form may lead to misinterpretation. The regulatory text contains the phrase "employed under a contract" which we believe is sufficient for the purposes of the form. However, we will maintain the description of the situation where the contract employment is through an organization or group rather than a direct contract in the Frequently Asked Questions section of the PSLF page on StudentAid.gov.</p>	<p>Change</p> <p>remove mentions of "contracted organization" in sections 5A, 7, and 9</p>

ICR Number 1845-0110 – PUBLIC SERVICE LOAN FORGIVENESS (PSLF) & TEMPORARY EXPANDED PSLF (TEPSLF) CERTIFICATION & APPLICATION
 (60D) Comment Response Table

		<p>employees of the qualifying employer." (emphasis added) Section 7 thus appears to eliminate the second pathway to PSLF eligibility where any individual borrower, regardless of their employment situation, who provides services but cannot be directly employed by the qualifying employer would still be eligible.</p> <p>Section 9 (providing "IMPORTANT INFORMATION ABOUT PSLF AND TEPSLF") states, "if you are a direct employee of a contracted organization that is in a position or providing services that, under applicable State law, cannot be filled or provided by direct employees of the qualifying employer, you can be treated as a direct employee of the qualifying employer where you perform your work." As with Section 7, this statement will be read by potential applicants to exclude the secondary pathway for PSLF eligibility established in the Final Rule, where borrowers are eligible if they "provide services" for the qualifying employer where such services cannot be "provided" by a direct employee of the qualifying employer. Section 9 suggests inaccurately that borrowers are eligible if and only if they are direct employees of a contracted organization.</p>		
010	SBPC		See SBPC 60 day comment responses document	
011	MA AG		See MA Att Gen 60 day comment responses document	