



September 24, 2021

Julie Margetta Morgan  
Senior Advisor, Office of the Under Secretary  
U.S. Department of Education  
Washington, DC

**Re: Request for Information Regarding the Public Service Loan Forgiveness Program**

Dear Ms. Morgan:

The National Association of Social Workers (“NASW”) appreciates the opportunity to provide this comment in response to the Department of Education’s (the “Department”) July 26, 2021, Request for Information Regarding the Public Service Loan Forgiveness (“PSLF”) program. Founded in 1955, NASW is the largest membership organization of professional social workers in the world. NASW has 110,000 members and works to enhance the professional growth and development of its members, to create and maintain professional standards, and to advance sound social policies. We write to provide information on public service and student debt (questions 1, 2, and 3); borrowers’ experience with PSLF (questions 4, 5, 6, and 7); and opportunities to strengthen PSLF for borrowers who currently work in public service (questions 11 and 12).

In brief, social workers provide essential services to people with varied behavioral health and social care needs in all stages of life. These needs have been exacerbated by the coronavirus pandemic and associated employment collapse. The demand for social workers is projected to grow significantly over the next decade, but educational institutions are not on pace for meeting this need. The cost of education for social workers is high—a Master’s degree is required to practice clinical social work independently—but compensation remains persistently low. Accordingly, many of our members have an unsustainable debt burden. Further, this debt burden is not distributed equitably. Our highly indebted profession is disproportionately comprised of

women—over 83% of social workers are female.<sup>1</sup> And within the profession, people of color and women hold a disproportionate share of student loan debt.

Meaningful student debt relief is essential to ensure a strong and plentiful social work workforce and to keep the profession financially accessible. As the Department knows, PSLF has failed to provide virtually any debt forgiveness, leaving applicants with persistent debt that they cannot afford to repay. This debt causes financial stress for many social workers and poses a barrier to non-profit and government employment. In some cases, it drives highly qualified social workers out of the profession. We urge the Department to provide urgently needed student loan debt relief for social workers, including through improving the administration of the PSLF program, and federal loan cancellation.

We have gathered many social workers' student debt experiences below to provide individual stories that illustrate the profession-wide trends.<sup>2</sup> We hope that their compelling voices move the Department to act.

***Social workers provide an essential public service.***

There are over 700,000 professional social workers nationwide and they are the largest provider of mental, behavioral and social care services in the U.S. They have served on the frontlines of the COVID-19 pandemic as an essential workforce working across many different settings. Social workers are licensed and credentialed at the Bachelor's, Master's, and PhD levels. Roughly 250,000 are licensed clinical social workers, who are required to have a Master's degree to practice independently.

Social workers help people cope with and solve a wide variety of problems in their everyday lives. They are found in every facet of community life, including schools, hospitals, behavioral health clinics, senior centers, prisons, child welfare and juvenile services, the military, corporations, courts, private practice, elected office and in numerous public and private agencies. Social workers provide urgently needed mental health and behavioral health services and help clients who face a disability or a life-threatening disease or a social problem, such as inadequate housing or unemployment. Social workers serve on crisis response teams and assist victims of violence. They also assist families that have serious domestic conflicts, involving child or

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<sup>1</sup> The George Washington University, *Profile of the Social Work Workforce* (2017), at 5, <https://www.cswe.org/Centers-Initiatives/Initiatives/National-Workforce-Initiative/SW-Workforce-Book-FINAL-11-08-2017.aspx>.

<sup>2</sup> We have collected and reviewed copies of the individual comments submitted by our members and other social workers in response to a campaign we undertook to raise awareness about this Request for Information. We have quoted or summarized comments that we believe are typical or exemplary of social workers' experiences with student debt and PSLF throughout this submission. If you have any questions about these comments, require additional details, or would like to review a spreadsheet summarizing them, please contact our counsel, identified below.

spousal abuse and neglect. Social workers conduct research, advocate for improved services, engage in systems design, manage non-profits, or are involved in planning or policy development. Social workers provide these critically needed services to millions of Americans every day.

Many social workers specialize in serving a particular population or working in a specific setting. Some examples include:

- **Aging:** Social workers link older adults with services that help them live independently and with dignity, thereby maximizing their quality of life and participation in society. Social work with older adults focuses on the physical, psychological, social, and economic aspects of daily living.
- **Child Welfare:** Child welfare social workers serve some of the most vulnerable children, youths, and families. Social workers specialize in building on the strengths of families and helping them to provide a safe and nurturing environment for children and youths. However, when families are unable to do this, social workers must intervene to reduce risk and protect children from harm. Child welfare social workers ensure that children and youths who have experienced abuse or neglect are supported through a range of services.
- **Health Care:** Health care social workers help people deal with personal and social factors that affect health and wellness. Some health care social workers are in direct services and concentrate on individuals, families, and small groups. Others work in settings where the focus is on planning, administration, and policy. In the health care setting, social workers may conduct research, develop programs, and administer departments.
- **Schools:** Social workers in schools provide mental health and behavioral health services to students and an array of other services that support student health, wellbeing and academic achievement. These social workers often run groups, work on attendance issues, address student hunger and homelessness. They may also assist with students who have disabilities and or require Individual Education Plans.
- **Mental Health and Substance Use Disorder Services:** Clinical social workers focus on assessment, diagnosis, treatment and prevention of mental health and behavioral health conditions, including substance use disorders. Clinical social workers are essential to a number of client-centered settings and can be found in private practice, agencies and other community-based settings.

The COVID-19 pandemic disrupted the health and economic and social stability of many individuals and families, exacerbating the need for social work services. Social workers have provided their essential services throughout the pandemic. Hospital-based social workers have faced the pandemic head on, helping staff, patients, and their families navigate a new and dangerous disease and responding to intense pressure on medical resources. Social workers run

hotlines for students struggling with mental health during remote schooling.<sup>3</sup> They have responded to sharp increases in anxiety and depression nationwide, and corresponding increases in substance abuse and overdoses.<sup>4</sup> Those working in nursing homes have responded to catastrophic COVID-19 infection rates and corresponding facility quarantines, supporting residents, and providing information and support to families.<sup>5</sup> Social workers have advocated for people facing great risk of COVID-19 infection in jails and prisons and have continued to serve these exceedingly vulnerable populations.<sup>6</sup> This work often came with significant risk due to a lack of personal protective equipment and at great personal cost. As one social worker explained:

I am a social worker and for the past 11 years I have worked in mental health in upstate New York. I have worked with children, adults and families in outpatient clinics, inpatient facilities and emergency departments. I have shouldered the burden of keeping us safe on the front lines of the COVID-19 pandemic. During the pandemic I left my house every day, did not see my 3 year old daughter for weeks at a time, to report to the hospital system that I have dedicated the last 6 years of my career to; to support the mental health of the medical staff on the front lines; assist families in connecting with their loved ones whom they could not see in the hospital; and continued my regular role of assisting those dealing with mental health challenges in the community, which were exacerbated by the pandemic.

***The need for social work is great, but there are not enough qualified social workers to meet this need.***

The demand for social workers is expected to increase in coming years. Specifically, the Bureau of Labor Statistics (“BLS”) projects that the employment of social workers will increase

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<sup>3</sup> Alisa Roth, *Schools Seek Ways to Provide Mental Health Services During Pandemic*, Marketplace (Aug. 28, 2020), <https://www.marketplace.org/2020/08/28/schools-mental-health-services-covid-19-remote-learning-counseling-hotlines-appointments/>.

<sup>4</sup> Jennifer Miller, *Anxiety, Depression Among North Carolinians Has ‘Tripled’ During Pandemic, Health Leaders Say*, WBTV (July 30, 2020), <https://www.wbtv.com/2020/07/30/anxiety-depression-among-north-carolinians-has-tripled-during-pandemic-health-leaders-say/>.

<sup>5</sup> Mercedes Bern-Klug & Elise Beaulieu, *COVID-19 Highlights the Need for Trained Social Workers in Nursing Homes*, J. Am. Med. Directors Ass’n (Vol. 21, July 2020), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7247447/>.

<sup>6</sup> Alison O. Jordan & Melvin H. Wilson, *Addressing COVID-19 and Correctional Facilities: A Social Work Imperative*, NASW (June 2020), <https://www.socialworkers.org/LinkClick.aspx?fileticket=o6zZ1n0yE0k%3D&portalid=0>.

by twelve percent over the next decade.<sup>7</sup> This expected increase is fifty percent more than the average expected for all occupations.<sup>8</sup> There is expected to be a particularly significant need for child, family, and school social workers, healthcare social workers, and mental health and substance abuse social workers.<sup>9</sup>

We are already facing a lack of qualified social workers—of note, almost all child welfare programs struggle with recruiting and retaining qualified and effective child welfare staff. Turnover rates remain high, at 20 to 50 percent nationally.<sup>10</sup> Nor are educational institutions on pace to meet the expected increase in need. While enrollment in social work education shows modest growth, this upward trend does not match the anticipated need for qualified social workers. A survey of educational institutions providing social work degrees documented only a 1.3% growth in enrollment in Master’s degree programs from fall 2019 to fall 2020.<sup>11</sup> Federal investments in social work and social work education are critically needed to ensure that there is a sufficient supply of social workers to meet evolving demands.

***Social workers tend to have high student debt, but relatively low pay, making participation in the profession financially difficult and student debt relief essential.***

Social workers’ salaries are low, especially compared to the level of education required to practice in the field. While social workers can work in certain settings with a Bachelor’s degree, a Master’s of Social Work (“MSW”) is the terminal degree required to practice clinical social work independently. Despite these educational requirements, the median salary for social workers generally is just \$52,000.<sup>12</sup> The mean starting salary for social workers with MSWs is \$47,000.<sup>13</sup>

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<sup>7</sup> Bureau of Lab. Stat., U.S. Dep’t of Lab., *Occupational Outlook Handbook - Social Workers*, <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm> (last visited Sept. 21, 2021) (“BLS”).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Critical Workforce Needs*, Nat’l Child Welfare Workforce Inst. (Dec. 2020), <https://ncwwi.org/index.php/resourcemenue/resource-library/change-implementation/workforce-development-planning/1597-critical-workforce-needs-2020/file>.

<sup>11</sup> Ryan Bradshaw, *Spring 2021 CSWE Member Pulse Survey Results*, Council on Social Work Ed. (2021), [https://www.cswe.org/getattachment/Research-Statistics/CSWE\\_Spring-2021-Pulse-Survey\\_Brief.pdf.aspx](https://www.cswe.org/getattachment/Research-Statistics/CSWE_Spring-2021-Pulse-Survey_Brief.pdf.aspx).

<sup>12</sup> BLS *supra*, n. 7.

<sup>13</sup> Fitzhugh Mullan Institute for Health Workforce Equity, *The Social Work Profession: Findings from Three Years of Surveys of New Social Workers* (2020) at 12,

The disparity between salary and required education is worse than for comparable professions. For example, elementary and middle school teachers (for whom a Bachelor’s degree is typically sufficient) have a median salary of approximately \$61,000.<sup>14</sup> And other professions for which a Master’s degree is required, such as economists, education administrators, genetic counselors, and nurse practitioners, are better paid than social workers: Most professions for which BLS identifies a Master’s degree as necessary entry-level education have a median pay of \$60,000 or higher, and half have a median pay of \$80,000 or higher.<sup>15</sup>

Social workers often carry significant student debt, a problem that has gotten worse during the life of the PSLF program. 2019 MSW graduates have a mean total student debt of \$67,000.<sup>16</sup> The debt load for social workers with either a Bachelor’s degree or an MSW has been increasing over time.<sup>17</sup> As discussed in more detail below, the debt burden is substantially higher for social workers of color.

As our members have explained in their individual comments to the Department, the debt burden compared to their salaries is crushing:

- One social worker graduated with an MSW and \$160,000 in debt, only to make \$40,000 at their first job.

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<https://www.cswe.org/CSWE/media/Workforce-Study/The-Social-Work-Profession-Findings-from-Three-Years-of-Surveys-of-New-Social-Workers-Dec-2020.pdf>.

<sup>14</sup> Bureau of Lab. Stat., U.S. Dep’t of Lab., *Occupational Outlook Handbook – Middle School Teachers*, <https://www.bls.gov/ooh/education-training-and-library/middle-school-teachers.htm>; Bureau of Lab. Stat., U.S. Dep’t of Lab., *Occupational Outlook Handbook – Kindergarten and Elementary School Teachers*, <https://www.bls.gov/ooh/education-training-and-library/kindergarten-and-elementary-school-teachers.htm>.

<sup>15</sup> Bureau of Lab. Stat., U.S. Dep’t of Lab., *Occupational Outlook Handbook – Occupation Finder*, <https://www.bls.gov/ooh/occupationfinder.htm?pay=&education=Master%26rsquo%3Bs+degree&training=&newjobs=&growth=&submit=GO> (Filtered by “Master’s Degree” under the Entry-level Education column).

<sup>16</sup> Edward Salsberg *et al.*, *The Social Work Profession: Findings from Three Years of Surveys of New Social Workers*, NASW (Aug. 2020) at 12, [https://www.socialworkers.org/LinkClick.aspx?fileticket=1\\_j2EXVNspY%3d&portalid=0](https://www.socialworkers.org/LinkClick.aspx?fileticket=1_j2EXVNspY%3d&portalid=0).

<sup>17</sup> *2019 Statistics on Social Work Education in the United States*, Council on Social Work Ed. (2020) at iv, <https://www.cswe.org/getattachment/Research-Statistics/2019-Annual-Statistics-on-Social-Work-Education.pdf.aspx>.

- Another noted that it “has not been uncommon throughout my professional career... to see requirements for a Master’s degree, a license, and at least 5 years experience - with a salary of under \$40,000.”
- A third explained, “I needed to obtain my Master’s degree in order to make more money and be more effective. *After being in the field since 2004, I have not paid down my balance and owe over \$163,000.*”

These individual experiences are typical. Throughout the field, while social workers report satisfaction with their profession and their jobs, they are substantially less satisfied with their salaries.<sup>18</sup> Of those who reported difficulty in finding a job upon entering the job market, the most common reason was inadequate salary and compensation.<sup>19</sup> The financial pressure resulting from low salaries is heightened by high levels of educational debt.

For many social workers, this financial pressure makes it difficult to afford essential goods and services in their lives. As our members have told the Department, some find it difficult to balance student loan debt and childcare, while others must choose between paying their rent or mortgage and their student loans. One social worker with an MSW explained, “I worked two jobs consistently while in school for nine years. I am in more student loan debt than I believe I will ever be able to get out of in my life. My child consistently asks me for a home, and I am unable to promise her that.” Another social worker explained student debt’s impact on their family:

I am an active and passionate clinician. But, having done all I have done and will continue to do - I still will not be able to pay for my own children’s higher educations, because I still owe for my own. ... [W]hile my education may be priceless to me, that it most certainly has a price tag, and that tag is crippling to my family[.]

For some social workers, staying in the public service sector means living with the same intense financial pressures as the low-income people their work often supports. For example, one social worker described the difficult choices imposed by pay that totaled just \$20 more than the SNAP eligibility threshold—they could either “decreas[e] hours to feed my kids or maximiz[e] hours so I can afford to pay minimum for school.” Another social worker described “the indignity of my nonprofit employer telling us that we, Master’s degree-carrying therapists...who were serving the poorest families, could potentially qualify for food stamps based on our low salaries.”

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<sup>18</sup> Salsberg, *supra* note 16, at 17.

<sup>19</sup> *Id.*

Many of our members worry about having to continue paying their loans indefinitely, and as several have commented to the Department, they do not expect to finish paying off their loans before they die.

***The high debt burden borne by social workers is inequitable.***

Social workers are disproportionately women and people of color, making the high debt burden faced compared to other professions inequitable. In recent years, nearly 90% of MSW graduates have been women. And more than 22% of new social workers are Black/African American, and 14% are Hispanic/Latino. These percentages are much higher than in most health professions.<sup>20</sup>

Compounding this problem, many new social workers are the first generation in their families to graduate college. In 2019, for example, more than 46% of the MSW graduates were the first ones in their families to graduate college; this was particularly true for Blacks/African Americans (57%) and Hispanic/Latinos (73%).<sup>21</sup> This suggests that as a profession, they are relatively unlikely to have family resources that can help repay the debt—about one third reported receiving financial support from their families. As one first generation college (and then graduate) student explained, her family was unable to contribute financially to her education. She is now working as a clinical social worker supporting burn survivors—but her outstanding student debt, after more than a decade of work and repayment, is still more than double her annual salary.

Unsurprisingly, the debt burden is not distributed equitably within the profession either. Debt from their social work education is substantially higher for new social work graduates who are Black/African Americans (averaging \$92,000 compared to an average of 67,000 for White graduates, for attainment of both bachelors and master’s degrees) and for Hispanics (averaging \$79,000).<sup>22</sup> Female social workers also had higher mean debt from their social work degree than did their male counterparts.<sup>23</sup> The student debt crises experienced by social workers magnifies historic economic inequalities, perpetuating the inequitable distribution of resources.

***Meaningful student debt relief is essential to support social workers and to keep the profession financially accessible.***

For many social workers, loan forgiveness is the only realistic way out of this significant debt. As our members have told the Department, despite their best efforts, it is not realistic to pay off what is frequently more than \$50,000 in student debt at their salaries. For those with even

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<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> *Id.* at 12.

<sup>23</sup> *Id.* at 32.



higher debt burdens, sometimes beginning at more than \$100,000 in student loans, they have seen their total debt double to more than \$200,000 despite consistent payments.

For social workers facing this debt burden, federal debt relief is essential to continue in their profession. Many of our members accept the lower salaries provided for public service about which they are passionate, relying on the promise of loan forgiveness, while others feel “stuck in a low paying job because I am holding out to have my \$100k forgiven.... terrified I will stay in this low paying position for 3 more years only to be denied.” Others worry that despite their passion for the work, they will not be able to “sustainably continue to work [in social work] without the help of [PSLF].”

The unbearable debt burden has pushed nonprofit and government-employed social workers into the private sector or out of the profession. As one of our members explained, she had been working in community-based non-profit agencies treating mental health and substance use disorders in West Virginia for over ten years but was denied PSLF because of her payment plan. She explained that “[u]pon learning that none of the payments ... that I had made over those 12 years would qualify for PSLF, and that in order to be considered I would have to restructure my payment plan and go back to the beginning to make 120 payments over 10 years, I decided to leave the community based non-profit sector and now work in a private practice instead.” Similarly, another explained that, after ten years of repayment, when many loan payments were deemed ineligible for PSLF, “I left a job I truly cared about [in a Community Mental Health Center], a community that needed workers like myself, all because I could not afford to keep paying my student loans with the income I was bringing in.”

As one of our social workers explained:

If I'd known that [the PSLF] program would not provide the promised forgiveness, *I likely would have chosen a different profession.* The financial hardship of low pay and high debt contributes to burnout in our field. The mental health field is crucial to the people of our country, yet this program that was supposed to allow more people to go into public service has been functionally weakened to the point of insignificance. I am an excellent mental health clinician and the field would lose out if I were not in it. Yet I am now 49 years old and I will be paying these loans for the rest of my life and will likely die with a huge portion unpaid. (Emphasis added).

### ***The PSLF program has not helped social workers.***

Social workers are exactly the type of profession the PSLF program should be supporting—we provide a tremendously valuable social service, at a high educational cost, but with low pay. Even so, the PSLF program has failed our profession. The Department is well aware that the PSLF program has not provided any meaningful or widespread student loan relief. Social workers' experience is no different.

Loan forgiveness has been effectively unavailable through the PSLF program for many reasons: the lack of awareness of and advertising of the program, eligibility requirements that were not readily available or easy to understand, ineligibility resulting from changing jobs or from being in forbearance or deferment on payments, ineligibility resulting from holding the wrong type of loan or as a result of loan consolidations, misinformation from loan servicers, eligibility criteria of which they were not informed until *after* completing what they expected would be their final payment, and a confusing and burdensome application process.

As social workers attest in their individual comments, the PSLF program was inadequately advertised and explained. Many social workers did not know that PSLF existed, despite working for more than a decade in the field. Even those who knew about the program noted that it was “very poorly advertised” and that eligibility requirements were not clear or readily available. For example:

- A nonprofit healthcare social worker explains, “had I known of this program when it was established, or indeed at any point that it was something I would qualify for, I could have been one of the first to apply. However, it was not until 2017 that I learned that PSLF was actually a program I would qualify for! ... When I finally learned more about PSLF and that I qualified (and always would have), I learned that I was not on the correct repayment plan, so I had to re-consolidate my loans and eventually was approved. So, for all of the money I paid, which would have qualified for PSLF on a different plan, all of that time and money does not count.
- One social worker writes that because their “first few years were contracted,” and they weren’t “in a payment plan that led to qualified PSLF payments, despite serving homeless vets for over 10 years I am still making payments and will be for more years longer.”
- One licensed clinical social worker explained: “[I] worked in the charter public school system for almost 6 years. I applied repeatedly for the 10-year loan forgiveness [program] and the red tape was unbelievable. I had co-workers who got their paperwork through, and approved, but mine would not get accepted because I technically work for [a charter school management company] and not the school... despite being told for years that I would [qualify].”
- Another “worked in a school system for 10 years and [still] could not qualify because I am not a teacher [despite being] on a teacher’s contract.”
- And yet another “had been trying to apply to the student loan forgiveness program for many years and got denied each time even though I was working for a nonprofit and I should have qualified.”
- Another social worker described their experience: “I graduated in 2008 and did everything I could from the start to satisfy the loan forgiveness requirements. Yet it was never enough and something was always wrong. In 2019 the website said I had

only met a couple years of requirements, which was absurd! I was on the phone with my borrower nearly every year confirming I was doing what was right, and I had only knocked off a couple of years? In 2019 before the pandemic I couldn't handle knowing I was paying more in student loan debt than I was in my mortgage and childcare combined"

Many public sector social workers have been unable to access PSLF because they unknowingly were paying the wrong type of loan for years or their income-based monthly payments were deemed ineligible.

- One nonprofit employee lost 3 years of payment eligibility towards the PSLF because they were “not informed that [consolidating their debt] would restart the clock on PSLF payments.”
- A hospital-based social worker with an MSW, “learned that I was not on the correct repayment plan, so I had to re-consolidate my loans and eventually was approved,” which negated the prior 19 years of loan payments.
- Another explained, “I wish I knew that being in forbearance or deferment didn't count as time with PSLF. I currently owe about twice what my original loans were, with no inkling of relief.”
- A clinical social worker with 15 years' experience in mental health and substance use disorders in West Virginia explained, “[b]ecause my payments were on the ‘graduated’ plan rather than ‘income based,’ I was deemed ineligible for the Public Service Student Loan Forgiveness program.”
- As another explained, “[e]ven though I have worked for [nonprofits] for over 10 years I am told I have ‘the wrong type of loan’ and would need to apply to consolidate under a different loan and would then have to pay another 10 years' worth of payments.
- Another said, “I made regular payments according to my income (\$212.00/mo.) for years only to find out later (and too late) that the program qualifications were to make regular payments at a much higher rate. Because I ‘under paid’ I was disqualified from the program, though I wasn't aware of these terms when I began payment - just that I needed to make regular payments for 10 years working in public service. I have been working currently in the field of public education for 18 years and still have student debt to pay off!”

The failure of the PSLF program deters others from even attempting to apply. One social worker explained that they refused to consolidate their loans under a different plan because “of the well-known failure of the loan forgiveness program with over 95% of participants being denied,” while another mentioned that they started the PSLF program “late due to several rumors about the brokenness of the program and lack of people being awarded.”

The lack of consistency and transparency around eligibility for PSLF harms those who should have been eligible based on the work they were doing but made nonqualifying payments for years due to lack of clear information from the Department, lenders, and servicers. The problem is made worse by the fact that interest continues accruing during these periods of ineligible payments and protracted application processes: one public sector social worker's student debt "balance increased by \$695.25... after 153 months of payment."

### ***Proposals***

PSLF's failure is due to a combination of arbitrary and narrow regulations, administrative mismanagement by the Department, and widespread abuses across the student loan industry. The Department must guarantee that all changes to the program aren't just prospective but provide immediate relief, and justice, to dedicated public service workers. As set forth in more detail in a coalition letter which we joined, we request that the Secretary of Education:

- **Eliminate all student debt owed by those who have served for a decade or more in public service;**
- **Grant one year of credit for each year of service for all public service workers who owe a federal student loan; and**
- **Ensure relief to public service workers is automatic.**<sup>24</sup>

The Secretary also has the power to take the following regulatory or sub-regulatory actions to expand access to PSLF for current social workers and ensure that that indebted social workers obtain immediate relief.<sup>25</sup>

- **Expand the definition of "eligible loan" to provide relief for all borrowers with federal student loans.** The Secretary of Education can take administrative action to expand the definition of an "eligible loan" under PSLF, ensuring that any borrower with a federal student loan who spent a decade working in public service can obtain loan forgiveness, consistent with the intent of the law.
- **Expand the definition of a qualifying payment plan for all borrowers and automatically, retroactively count qualifying months based on administrative**

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<sup>24</sup> The letter is available at: <https://protectborrowers.org/wp-content/uploads/2021/09/FINAL-SIGNERS-Coalition-PSLF-RFI-Letter.pdf>.

<sup>25</sup> For more detail regarding these proposals and the Secretary's authority for doing so, please see *Delivering on Debt Relief* (Nov. 2020), available at <https://protectborrowers.org/wp-content/uploads/2021/02/Delivering-on-Debt-Relief-Final.pdf>.

**data.** The Secretary of Education can ensure all borrowers can get credit toward PSLF for working in public service, irrespective of the payment plan selected by the borrower or whether or not a borrower had paused payments by using a deferment or forbearance.

- **Expand the definition of a qualifying payment to ensure all payments made by public service workers are eligible for PSLF and automatically, retroactively recount qualifying payments based on administrative data.** The Secretary can immediately act to ensure no borrower is denied progress toward PSLF as a result of unnecessary regulatory or policy hurdles imposed by prior administrations.
- **Expand the definition of “public service” employment and automate the process of verifying employment.** The Secretary can immediately use the authority under the HEROES Act to retroactively redefine “public service” employment, defining this term as encompassing both the broad, employer-based definition in the current implementing regulations, and the job-function specific definition enacted by Congress. Among the arbitrary exclusions of various public-interest employers, our organization, NASW, is not a qualifying employer for PSLF, despite being a not-for-profit organization and pursuing a public-interest oriented mission. The social workers who comprise our staff are thereby excluded from necessary debt relief.

Further the Secretary can use all available government data sources, including the Defense Manpower Data Center, federal Office of Personnel Management employment records, state and local government employment records, and borrower tax data, to automate and identify public service workers who owe student debt.

### ***Conclusion***

We request that the Department use all of its authorities to provide student loan debt relief for social workers, including through improving the administration of the PSLF program, and through federal loan cancellation. If you have any questions or would like to discuss the information in this comment, please contact Robin F. Thurston, Democracy Forward Foundation, Counsel for NASW, at 202-701-1775 or [rthurston@democracyforward.org](mailto:rthurston@democracyforward.org).

Respectfully submitted,



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Sarah Christa Butts, MSW  
Director of Public Policy  
National Association of Social Workers