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July 28, 2022

Michelle Asha Cooper
Acting Assistant Secretary for Postsecondary Education
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Notice of Proposed Rulemaking; Student Assistance General Provisions, Federal Perkins Loan Program, Federal Family Education Loan Program, and William D. Ford Federal Direct Loan Program – Docket No. ED-2021-OPE-0077-1350

Dear Acting Assistant Secretary Cooper:

On behalf of the American Psychological Association (APA), we are writing to offer public comments to the Notice of Proposed Rulemaking (NPRM) on Student Assistance General Provisions, Federal Perkins Loan Program, Federal Family Education Loan Program, and William D. Ford Federal Direct Loan Program, published in the Federal Register by the Department of Education on July 13, 2022, Docket No. ED-2021-OPE-0077-1350. Specifically, our comments will focus on proposed changes to the Public Service Loan Forgiveness (PSLF) program and elimination of non-statutory student loan interest capitalization.

APA is the nation's largest scientific and professional organization representing the discipline and profession of psychology, with more than 133,000 members and affiliates who are clinicians, researchers, educators, consultants, and students. Through the application of psychological science and practice, our association's mission is to have a positive impact on critical societal issues.

Although, as a whole APA supports the proposed changes in the NPRM, our comments will urge the department to take further action by:

- Making further clarifications to qualifying employment under PSLF.
- Waiving the requirement that an otherwise eligible borrower must be employed in public service at the time of loan forgiveness.
- Codifying and extending the temporary waiver.
- Further increasing transparency in the application process and frequency of communication with borrowers.
- Canceling student debt owed by borrowers in public service for 10 years or more.
- Strengthening oversight of student loan servicers.
- Making the elimination of interest capitalization retroactive.
- Working with Congress to make statutory changes to both PSLF and interest capitalization.

Student loan debt has surpassed credit card debt in America.ⁱ Nearly 43 million borrowers with federal student loan debt and about 2.4 million additional borrowers with private student loans, have a collective outstanding balance of nearly \$2 trillion.ⁱⁱ With the overall amount of student debt increasing substantially since the Great Recession, millennials are now the most educated,

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most student loan-indebted, and poorest—in terms of both in income and wealth—generation to date.ⁱⁱⁱ Debt is also having an impact on college enrollment. Colleges and universities are experiencing noticeable enrollment declines, particularly since the start of the pandemic, with prospective students continuing to cite cost of higher education as a determinative factor in whether they chose to pursue advanced degrees.^{iv v}

Beyond just direct educational costs, much of this borrowing is being driven by the increasing cost of living. However, for graduate and/or professional education, it is a combination of both. Data show that psychology graduate students have difficulties affording healthcare, are concerned about being able to afford completing their training requirements, and have difficulties focusing on their studies and dissertation as a result of trying to make ends meet.^{vi} At the same time, demand continues to grow for careers where an advanced degree is required at entry level, many of which are also in public service.^{vii} This includes psychology, teaching, nursing, and social work, among others.

Furthermore, as a result of a variety of factors, including lack of generational wealth, students of color, first-generation, and lower socioeconomic status students tend to borrow significantly more, both for their undergraduate and postbaccalaureate degrees.^{viii} This is true across all fields, but data show that low-income students and students of color working toward doctoral psychology degrees also disproportionately rely on student loans.^{ix} The prospect of adding further debt often serves as a disincentive to pursuing advanced degrees. Higher student loan debt further impedes workforce diversity, including in mental and behavioral health care fields, where demand for representative, culturally competent providers is high.^x

The majority of states require an advanced degree for licensure in the mental and behavioral health fields. Health service psychologists graduate with an average debt load between \$95,000 and \$160,000, and close to half of doctoral-level psychologists rely on loans or their own funds to pay for graduate school, which takes on average 5-6 years to complete.^{xi} Research shows that debt impacts career choice, reducing the probability that qualified professionals will pursue careers in public service.^{xii}

The Public Service Loan Forgiveness (PSLF) program

PSLF encourages individuals to pursue public service by providing loan forgiveness on remaining debt from eligible federal loans after 10 years of payments. It continues the history of the federal government providing incentives for talented individuals to enter public service. Even before the pandemic, data showed that the need for licensed mental and behavioral health professionals was great across the United States, with every state having documented mental health professionals shortage areas.^{xiii} The national shortage of psychologists is expected to be at 14,300 by 2030, and at the same time, the largest growth in demand over the next decade is expected in schools, hospitals, mental health centers, and social service agencies.^{xiv} Rural communities are especially in need of mental health providers, including psychologists, and face serious challenges recruiting licensed professionals.^{xv} COVID-19, along with the collective trauma of a national reckoning with racism, gun violence, and the rolling back of reproductive rights, among other factors, has further amplified these needs.^{xvi xvii xviii}

PSLF is working to close these gaps. Psychologists depending on PSLF have committed to staying in a nonprofit or government setting for a minimum of ten years. These highly trained providers are working in neighborhoods and communities, providing public safety, health, education, and social services. They are on the frontlines in the fight against the opioid epidemic,

the scourge of suicide, and the mental health effects of COVID-19, including among our nation's youth. They are working with children to address issues such as bullying and social and emotional learning, with the goal of improving educational outcomes.

Since the first cohort of borrowers became eligible for PSLF in 2017, just about 1.2 percent have received loan forgiveness.^{xxix} Data from the Department of Education show that approximately half of the borrowers denied forgiveness were those who consolidated their loans at some point during their 10-year repayment window.^{xxx} As consolidation loans typically incur higher interest rates, these borrowers increased the cost of their loan without receiving the promised forgiveness. Furthermore, a majority of applications are rejected because of processing errors related to PSLF eligibility requirements, such as not having made all their payments in a qualifying repayment plan or not working for qualifying employer.^{xxxi} In totality, this has resulted in the loss of hundreds of thousands of borrowers in the PSLF pipeline.^{xxxii}

APA strongly supports the department's recent efforts to expeditiously make fixes to the administration of the program. Specifically, the temporary waiver issued in October 2021, which retroactively counted prior payments for borrowers enrolled in PSLF, irrespective of federal loan type or repayment plan, while also reviewing previously denied applications for errors and giving borrowers more options to appeal. This has led to over 100,000 borrowers receiving student loan forgiveness. We are also encouraged by the changes proposed in the NPRM and offer the following recommendations for your consideration as the department works to finalize the rule and continue ensuring that PSLF lives up to its intent as a broad-based program for public service and loan forgiveness.

Definition of Qualifying Employer & Full-Time Employment

APA supports the proposed changes to what constitutes a qualifying employer for the purposes of PSLF. As eligibility for this program is directly tied to employment type, increased simplicity and clarity will provide borrowers with greater certainty as to their continued progress towards forgiveness. The current definition has led to much confusion, and data show that the majority of applications are rejected because they do not meet PSLF requirements, including not working for qualifying employer.^{xxxiii}

While the NPRM retains the 30-hour per week definition of full-time work, it provides more flexibility to borrowers by removing the provision that the requirement for full-time employment is the higher of 30 hours or the number of hours the individual's employer considers full-time. Additionally, changes to ensure that the process works better for non-tenured instructors by adding a formula for determining the equivalent of their full-time employment, are encouraging.

- **Recommendations**

- While APA commends the department's efforts to clarify PSLF employment eligibility criteria, one area where further clarity would be welcome is PSLF qualifying status for doctoral interns, residents, and fellows. An internship is a requirement for doctoral-level psychologists, and serves as a valuable learning experience critical to their training. Under the supervision of licensed psychologists, interns provide high quality mental health care, often times for underserved populations, including in hospitals and community and federally qualified health centers. Although, many doctoral psychology interns may already qualify for PSLF, having explicit guidance from the Department of

Education as to their eligibility would help ensure that this critical portion of the mental health care workforce is indeed covered.

- The department must also take further action to clarify employment requirements for nonprofit organizations 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.^{xxiv}
- There are many public-serving professionals that provide such services at for-profit entities. For example, a psychologist working at a for-profit hospital. These individuals are also part of the public service workforce and thus should qualify for PSLF. The department should consider adding such a clarification in the final rule. Considering the shortages of health care providers, including psychologists, nationwide, further limiting PSLF’s reach as a recruitment tool is shortsighted. This is especially true in rural communities, that have traditionally had challenges recruiting qualified professionals.
- Finally, the department should waive the requirement that an otherwise eligible borrower must be employed in public service at the time of loan forgiveness. Many borrowers, who have made the necessary 120 qualifying payments while in public service, have since left those careers. This includes many psychologists. If they met all the criteria necessary to qualify for PSLF, they should not be penalized and denied the loan forgiveness they earned, simply because they file a PSLF form, to verify their previous public service employment, while no longer working for a qualifying employer.

Proposed Changes to Payments & Deferment and Forbearance

APA supports the commonsense changes that the department is proposing to the way PSLF payments are considered and calculated, which acknowledge the need to provide borrowers with added flexibility. This includes allowing lump and advanced payments to count towards PSLF and removing the requirement that PSLF qualifying payments be made in full within 15 days of being due, so long as the loan is not in default.

We also strongly support the proposed elimination of resetting the number of qualifying monthly payments counted toward PSLF for borrowers who consolidate their loans, which is currently being allowed through the temporary waiver. The current practice has been a significant barrier for borrowers progressing in PSLF. Data show that approximately half of the borrowers denied forgiveness were those who consolidated their loans while making their 120 qualifying payments.^{xxv} Effectively, this shows that borrowers followed the rules by consolidating their ineligible loans into an eligible consolidation loan, and were still denied the cancellation they earned, through no fault of their own. Allowing past pre-consolidation payments to count toward PSLF is a necessary change that will make a huge difference to the success of the program.

Additional changes to allow certain deferments and forbearances to count toward PSLF would also provide borrowers, including those experiencing health concerns, financial hardships, or in military service, much needed flexibilities to successfully progress in the program.

- **Recommendations**

- APA urges the department to both fully codify all provisions of the temporary waiver and extend it beyond its current October 31, 2022 end date. With changes proposed in the NPRM not taking effect until July 1, 2023, without such an extension, borrowers will be caught in an eight-month gap where the current regulations will take precedence once again, without any avenue for recourse.
- APA also strongly encourages the department to work with Congress to make necessary statutory changes to PSLF, particularly with respect to eligibility of federal student loan type. A significant number of psychologists have federal loans that are not Direct loans, mostly from the Federal Family Education Loan (FFEL) Program. FFEL loans, including those that are held commercially, are still technically federal loans, even though they were disbursed at a time when the federal student loan portfolio was being administered in a different way. Making such a distinction between Direct and non-Direct Loans is arbitrary and unfair to borrowers who simply took student loans at a time before Direct Loans were available.

Even with the proposed change to allow past pre-consolidation payments to count toward PSLF, requiring these borrowers to consolidate their loans in order to qualify for PSLF adds an additional requirement to a program that is already complex and increases the overall cost of the loan, as interest rates for consolidated Direct Loans tend to be higher. This is especially true for those with graduate loans—including psychologists—that already have higher interest rates to begin with. Additionally, with the data showing that many of the PSLF denials stem from participants not having the correct type of loan, having only Direct Loans qualify for PSLF is not just unnecessary, but also creates more hurdles and confusion, which contribute to the problems the program continues to face.

- The department should also consider allowing graduate-degree holders to opt-out of the in-school deferment and six-month post-graduation grace period if they would like to start making PSLF-qualifying payments before the deferment or grace period ends.

Proposed Changes to the Application and Reconsideration Processes

The PSLF application process has been burdensome for both borrowers and the department, making it partially responsible for severely high denial rates. Currently, the department manually reviews all applications. APA supports the proposed changes to reduce paperwork requirements by allowing for automation of progress toward forgiveness on eligible loans, without an application, when sufficient information is provided to determine eligibility. The proposed data sharing agreements between the department and other agencies is a needed addition that would ease this process for federal employees. Such changes are intuitive and will lead to a more streamlined process, for both the applicant and the department. APA is also encouraged by the department's efforts to create a formal appeals and reconsideration process for borrowers whose applications have been denied.

- **Recommendations**

- In addition to the proposed changes, borrowers should be provided with ways to check the status of their PSLF enrollment and number of qualifying repayments made in real-time. The department must also provide clear, consistent, and transparent information and guidance regarding eligibility and denials.

When considering most borrower experiences with PSLF, lack of clarity and infrequency of communications are among their top complaints. The department must make every effort to expressly provide transparent information to ensure that borrowers have a better experience with PSLF and increase the program's efficacy in meeting its intended goals.

The department should consider creating an online portal, which provides borrowers monthly updates on their progression in the program. This could also feature a checklist of whether they are meeting all PSLF requirements, and provide them notifications on whether they are out of compliance, the steps needed to make the proper fixes, and inform them when or if they need to reapply.

- Once its finalized, APA recommends that the department widely publicize the updated appeals process to all current and future PSLF applicants. According to previous reporting, although the department currently has a system for investigating complaints and making fixes related to PSLF, very few borrowers are aware of this process.^{xxvi}

Additional Recommendations

Despite the strong reforms to PSLF put forth in the NPRM, APA believes that there are additional actions that the department should take that would further strengthen the program by both rectifying past mistakes and ensuring that it functions better in the future.

- **Cancel student debt owed by borrowers in public service for 10 years or more.** The department should build upon both the temporary waiver and the proposed automation of the PSLF application process and conduct an audit of the student loan accounts of every potentially-eligible student loan borrower working in public service, after which it should provide student loan forgiveness for every public service worker who owes a federal student loan and has served for a decade or more.
- **Strengthen oversight.** Although a significant portion of forgiveness denials are due to mistakes made by loan servicers,^{xxvii} the NPRM does not address any needed oversight changes. According to a report from the Consumer Financial Protection Bureau, student loan servicers have systematically mismanaged PSLF, including by providing misinformation or misrepresenting the rights and options of borrowers.^{xxviii} Additional data show that more than 5 million errors committed by student loan servicers have significantly contributed to the failures of the program and harmed borrowers.^{xxix}

The department must guarantee stronger oversight of servicing entities, including by creating guidelines and training for all servicers to assist them in helping borrowers enroll

in PSLF and ensuring that no servicer is steering borrowers away from enrolling in the program. Additionally, relief must be provided to borrowers who have been harmed by servicer error, including by retroactively crediting PSLF borrowers with qualifying payments. Timely processing of borrower submissions must be required, and the burden should lay with the servicer, not the borrower, to identify and correct servicing mistakes. Furthermore, if state and federal investigations find systemic servicer errors, relief must be provided to harmed borrowers.

Finally, with the recently announced departure of FedLoan Servicing—which currently manages the loans of all borrowers enrolled in PSLF—from the federal student loan program, it is imperative that the department take all necessary steps to ensure that the transfer of the PSLF portfolio is seamless and that any negative impact on borrowers is mitigated.

- **Ensure enrollment of more eligible borrowers.** As mentioned briefly in the above section, the department must increase its efforts to raise the profile of PSLF to encourage participation by conducting outreach to inform the public of its benefits and notifying borrowers who are likely eligible about the program and its potential benefits.

Elimination of Non-Statutory Student Loan Interest Capitalization

Over the past decade, the federal government has taken a series of actions related to student loans that have disproportionately impacted graduate students, including the imposition of higher interest rates and multiple loan origination fees, as well as the elimination of subsidized federal loans. Interest on student debt, in particular, makes federal borrowing ‘costlier’ for graduate students. Without access to subsidized loans, graduate students begin accruing interest immediately upon disbursement of the loan. These interest rates are fixed, and since at least 2006, the median interest rates for unsubsidized loans and Grad PLUS loans have been 6.04 percent and 7.04 percent, respectively.^{xxx} Furthermore, any unpaid interest is capitalized and added to the principal balance of the loan.

This also impacts borrowers who are enrolled in Income-Driven Repayment (IDR) plans. Under IDR, most borrowers only pay a portion of their interest each month without making any payments on the principal of their loan. Any unpaid interest capitalizes, and further interest is then charged on that higher principal balance, thus increasing the overall cost. This causes a negative amortization of the balance, with the amount owed increasing even as payments are made. The result is a significant increase in the amount of debt carried by all students enrolled in IDR, but particularly for graduate students, who have higher interest rates.

APA strongly supports the department’s proposal to eliminate interest capitalization wherever it is not required by statute, such as when a borrower enters repayment, exits forbearance, defaults on a student loan, and upon exiting most IDR plans. This change would be a tremendous economic relief to many student loan borrowers, including psychologists.

- **Recommendations**
 - While APA applauds this proposed reform, we are concerned that if finalized, it would only be prospective. We encourage the department to consider making this

change retroactive, as not doing so would continue to harm borrowers who have been subject to increased debt due to interest capitalization, many for decades.

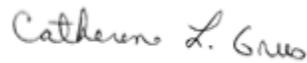
- Although we recognize that the department is statutorily constrained on how broad its actions can be under regulation, we urge you to continue working with Congress to pass legislation that would eliminate all instances of interest capitalization on federal student loans.

APA appreciates the department's continued efforts to improve the federal student loan and repayment system and the opportunity to provide comments on proposed changes that would impact current and future psychologists, especially as demand for mental health services continues to grow. In addition, we look forward to providing further comments on a future NPRM on proposed changes to Income-Drive Repayment and to seeing the final rules governing all these critical programs. If APA can be of assistance, please contact Kenneth Polishchuk, Senior Director for Congressional and Federal Relations & Education Policy Lead, at kpolishchuk@apa.org.

Sincerely,



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Chief Advocacy Officer



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Chief Education Officer

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