

September 24, 2021

Dr. Miguel Cardona, Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20024

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

Docket ID ED-2021-OUS-0082

Dear Secretary Cardona:

The Council for Opportunity in Education (COE) represents nearly 1,000 institutions of higher education and community-based agencies committed to expanding college opportunity by offering college access and success programs. Most of these institutions and agencies rely on Federal TRIO Program funding to support these efforts.

In 2007, Congress designed the Public Service Loan Forgiveness (PSLF) program to encourage talented, committed college graduates to commit themselves to public service, particularly in providing opportunity for our least-advantaged citizens. Many TRIO educators meet the PSLF employment eligibility requirements because they work full-time for public or nonprofit institutions of higher education, community-based organizations, or local government agencies. TRIO educators often work for limited pay and tend to be first-generation, low-income college graduates themselves.

We appreciate your request for information about the problems relating to student debt and PSLF, and ways the Department of Education (Department) can take immediate administrative action to relieve these burdens on public service workers – separate from the full formal negotiated rulemaking process later this year.

To meet this request, COE surveyed its membership of TRIO educators on student debt and their experiences with PSLF and received 463 survey responses. This letter includes summaries and stories of TRIO educators' hardships with student debt below and in the Appendix.

Here is a summary of our key findings and recommendations:

- Crushing student debt places a severe burden on TRIO educators' current financial situation – especially during the pandemic. **Student debt has caused more than two-thirds of TRIO educators to consider leaving TRIO or public service.**
- Consistent with the experience of many PSLF applicants, very few TRIO educators seeking loan forgiveness have been granted it. The program is clearly broken.
- The Department should take immediate actions to **provide TRIO educators with automatic debt relief if they have completed ten years of public service, and provide partial debt relief for each year of public service, before waiting for all ten years of public service to forgive all remaining debt.**
- Consistent with the law creating PSLF, the Department should **explicitly include TRIO educators and others working in college access and retention services for eligibility in any improvements to the program, and work with COE and TRIO grantees on outreach to ensure TRIO educators can take advantage of any improvements the Department makes.**
- In the long term, the Department should work with Congress to enact **new legislation to provide debt relief for TRIO educators and all public service workers after five years of service instead of ten.**

Below are additional details on how student loan debt affects the TRIO workforce, and recommendations for improvement. I include summaries and stories from TRIO educators' submissions in our membership survey on student debt and PSLF. As requested, these responses are organized in the same topics requested in the Department's RFI: 1) Public Service and Student Debt; 2) Experiences with Public Service Loan Forgiveness; 3) Opportunities to Strengthen PSLF for Borrowers who Currently Work in Public Service; and 4) The Effects of the COVID-19 Pandemic on Student Loan Borrowers in Public Service.

1. Public Service and Student Debt – TRIO educators are severely burdened with student debt, affecting their financial situation and their decisions to remain in TRIO or other public service.

There is evidence of a significant negative impact on the well-being and career longevity of TRIO professionals with outstanding student debt.

- **TRIO educators carry a major student loan debt burden. More than half of responding TRIO educators (51%) had student loan debt of more than \$50,000.** (83% of TRIO educators had student loan debt of more than \$10,000.)
- **Student loan debt is causing more than two-thirds of TRIO educators to seriously consider leaving education or their work in TRIO.** (35% responded "Yes," and 32% responded "Maybe" to the question "Is your student loan burden requiring you to seriously consider leaving education or leaving your work with TRIO?")
- **Only one in five TRIO educators are able to pay monthly bills and obligations and have money to put aside for savings.**
 - 23% of respondents stated there are some months when they struggle to pay monthly bills and obligations.
 - 11% stated they are falling behind financially and have gone into debt to pay monthly bills.
 - 44% of respondents can pay monthly bills but are not able to put money aside for savings.

When asked to share examples of student debt impact on daily life, financial decisions, family lifestyle, and plans for the future, TRIO educators shared devastating stories such as these:

"I've taken part time classes for over 12 years because I cannot afford to pay my loans and I am afraid of how payments will impact my credit worthiness. It made it nearly impossible to buy a house in my area, I had to move to a different state entirely (uproot my life) to have a sustainable income. I've delayed having a child out of my financial fears."

"For those of us that were denied and should have been approved, how do we apply again? Where do we go from here? I have over \$120,000 worth of student loan debt at 34 years old while on a IBR plan that I will never be able to pay in full, if I am not afforded the opportunity of PSLF. I will never be able to own a home and create a better life for my family. It's very disheartening as a TRIO/education professional that we sacrifice daily to encourage and ensure the success of our students by attaining a college degree, but we are unable to live by example the "dream life" that we inspire our students to achieve through higher education."

"While I am very passionate about and love the work I do in higher education serving diverse students from low-income, first generation backgrounds, the pay does not reflect the amount of work provided. Student debt does not simply go away. I have found that the amount of debt currently owed for pursuing a doctorate degree to stay relevant in the field and advance towards career trajectory has created a situation (because of the amount owed) to start seeking other opportunities outside of higher education." – Dr. Ashley Jones

2. Experiences with Public Service Loan Forgiveness – TRIO educators have had a large denial rate for PSLF and face inconsistent information and confusion from servicers.

Highlights from our COE membership survey of TRIO educators are as follows:

- **Of the TRIO educators who worked at least 10 years in TRIO or another public service position and applied for PSLF, only 23% were granted debt forgiveness.** Although this is much higher than the national average, this is still extremely low, and shows the PSLF program is not working as Congress intended.
- **TRIO educators cited many features of PSLF that are difficult to navigate:**
 - Lack of consistent information from loan servicers (45% of respondents cited this)
 - Amount of monthly payment and interest (35%)
 - Income-based repayment programs that affect eligibility (33%)
 - Enrolling in payment programs that disqualified them from PSLF eligibility without their knowledge (27%)
 - Lack of appeals process for determinations from loan servicers (20%)
 - Denial of PSLF after meeting the 10 year requirement (17%)

3. Opportunities to Strengthen PSLF for Borrowers who Currently Work in Public Service – The Department should take immediate steps to forgive student loan debt for TRIO educators, and explicitly include TRIO educators in student debt relief and outreach efforts.

COE has joined the Student Borrower Protection Center, National Education Association, American Federation of Teachers, and hundreds of organizations representing millions of public service workers and student loan borrowers in a [coalition letter](#) urging the Department to make three specific policy recommendations to improve PSLF:

- Eliminate all student debt owed by those who have served in public service for 10 years or longer.
- Grant one year of credit and partial debt forgiveness for each year of service for all public service workers who owe any type of federal student loan, instead of waiting until after ten years of service to forgive remaining debt.
- Ensure relief to public service workers is automatic.

In addition, COE offers the following additional recommendations:

- Consistent with the law creating PSLF, the Department should **explicitly include TRIO educators and others working in college access and retention services for eligibility** in any improvements to the program.
- Work with COE and TRIO grantee institutions on **outreach to TRIO educators to ensure they are able to take advantage of any PSLF program improvements and debt forgiveness ED plans to make.**
- Work with Congress on new legislation to **make public service workers – including TRIO educators – eligible for loan forgiveness after five years of service instead of ten.**

4. The Effects of the COVID-19 Pandemic on Student Loan Borrowers in Public Service – The Biden Administration’s extended pause on student loan repayment has been a lifeline, and without relief, TRIO educators will face severe burdens when the pause is scheduled to end in January 2022.

Many TRIO educators shared stories about how their student loan burden has been especially difficult during the COVID-19 pandemic. The Biden Administration’s extension of the temporary pause on federal student loan repayment through January 2022 has been a lifeline for many TRIO educators. However, when

this pause is scheduled to end in January 2022, TRIO educators with student loans will face major burdens in continuing to make payments while the pandemic's economic hardships continue.

Here are examples of how the pandemic has affected TRIO educators:

"I don't have enough money to support my parents financially as I should during this COVID 19 situation that affected them greatly. I have taken a side job in order to have enough money for my bills and my parents as well."

"Student debt prevents me from pursuing work opportunities in education that might not be up to the minimum salary required to fulfill student loans payments. COVID related flexibilities have helped, but they are ending, so increasing cost of living and other debts, may prompt me to look for jobs outside the TRIO career path."

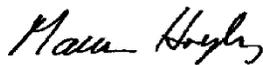
"I currently work two jobs to maintain my household and I have no children. Millions of Americans have received raises and bonuses during the Pandemic to return to work while TRIO employees never stopped working. Having to work two jobs to pay bills (rent, lights, water, food, insurance, car payment, etc.), I do not have enough money to save, make student loan payments or come up with an income driven payment plan."

Finally, one important point that was conveyed both implicitly and explicitly throughout this crisis is that, absent aggressive and immediate action by the Department to provide borrower relief, the very goals of postsecondary opportunity may be undermined. This notion is best summarized in the response below:

"Working in higher education should both pay more and allow for Student Loan Forgiveness. Since the Pandemic has started, I have seen high school graduates go to factories and make more than me and a 4-year degree is needed for my position. It's weird enrolling high school graduates into college and telling postsecondary dropouts that they should return when it appears you come out better without a college education in this day and time."

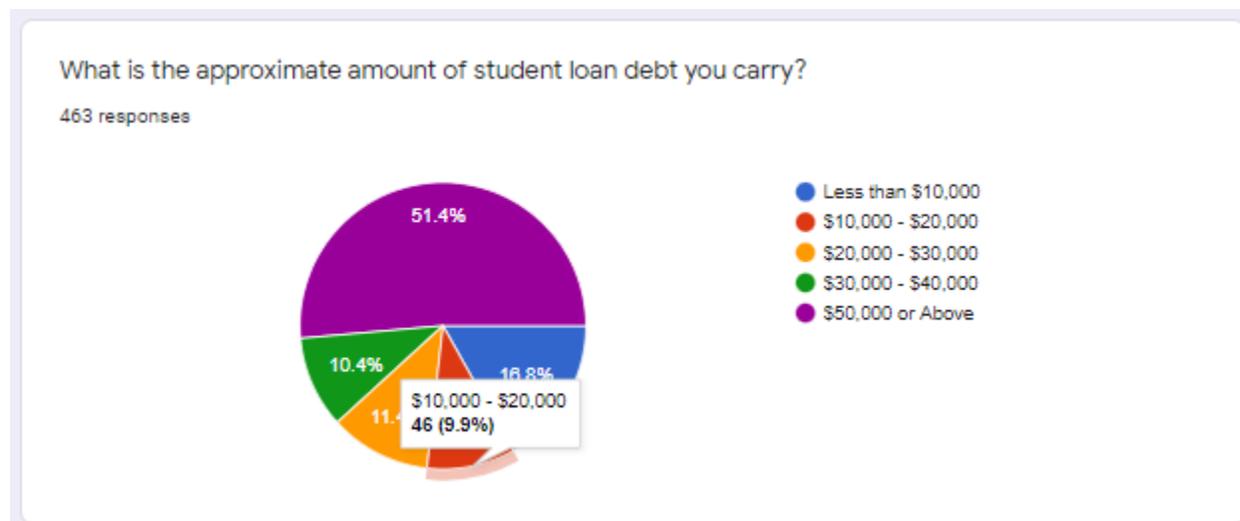
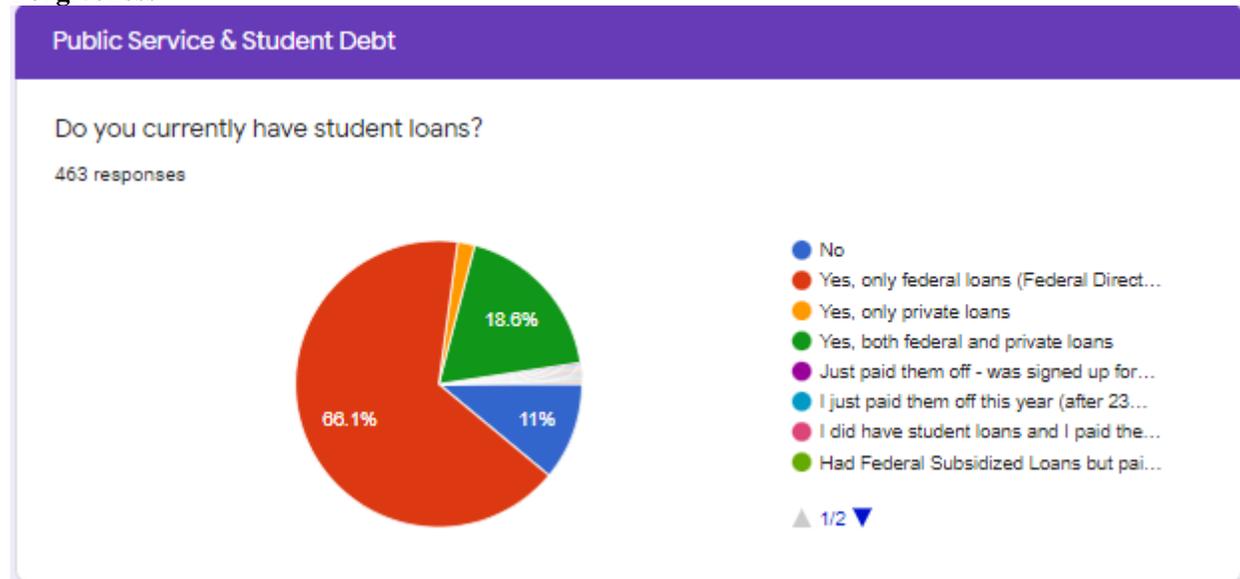
Thank you for your attention to these concerns as you work to improve the PSLF program and address the student debt crisis facing public service workers. COE and the entire TRIO community stand ready to work with you to ease the hardships of student loan debt for TRIO educators and other public service workers.

Sincerely,



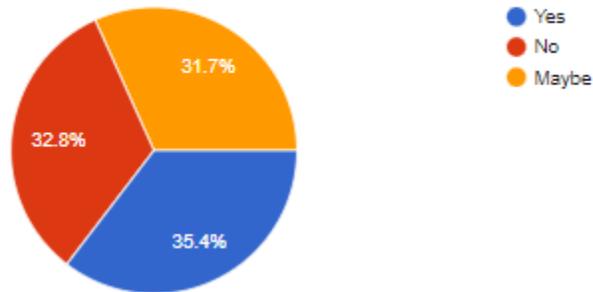
Maureen Hoyler
President

Appendix: Highlights of COE Survey of TRIO Educators on Student Debt and Public Service Loan Forgiveness



Is your student loan burden requiring you to seriously consider leaving education or leaving your work with TRIO?

463 responses



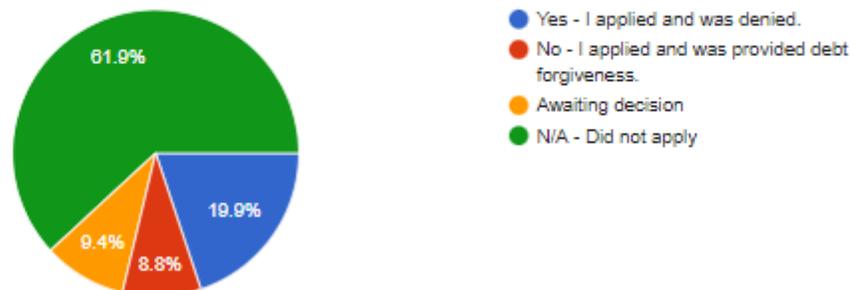
Which of the following best describes your current financial situation?

463 responses



Have you been denied Public Service Loan Forgiveness?

181 responses



Opportunities To Strengthen PSLF for Borrowers Who Currently Work in Public Service

As a TRIO educator, what features of PSLF are most difficult for you to navigate? Choose all that apply.

181 responses

