

# Public Service Loan Forgiveness: Current Rules and Processes

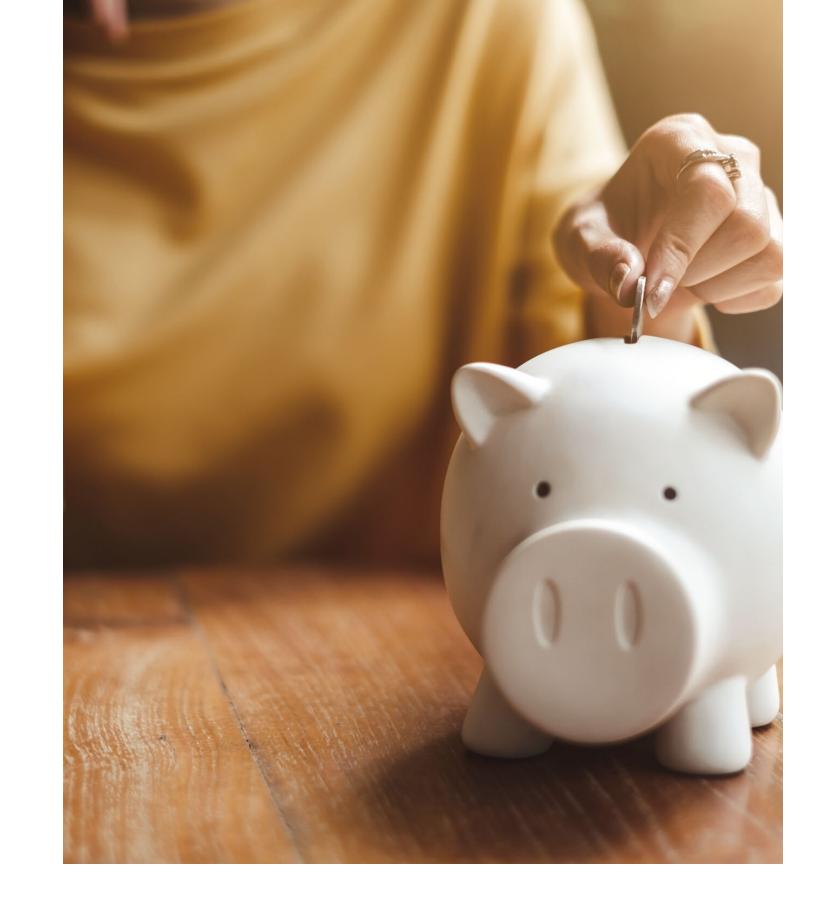


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# Agenda

- PSLF Eligibility
  - -Eligible Loans
  - -Eligible Employers
  - -Eligible Payments
  - -TEPSLF
  - -How to Apply
- Resources

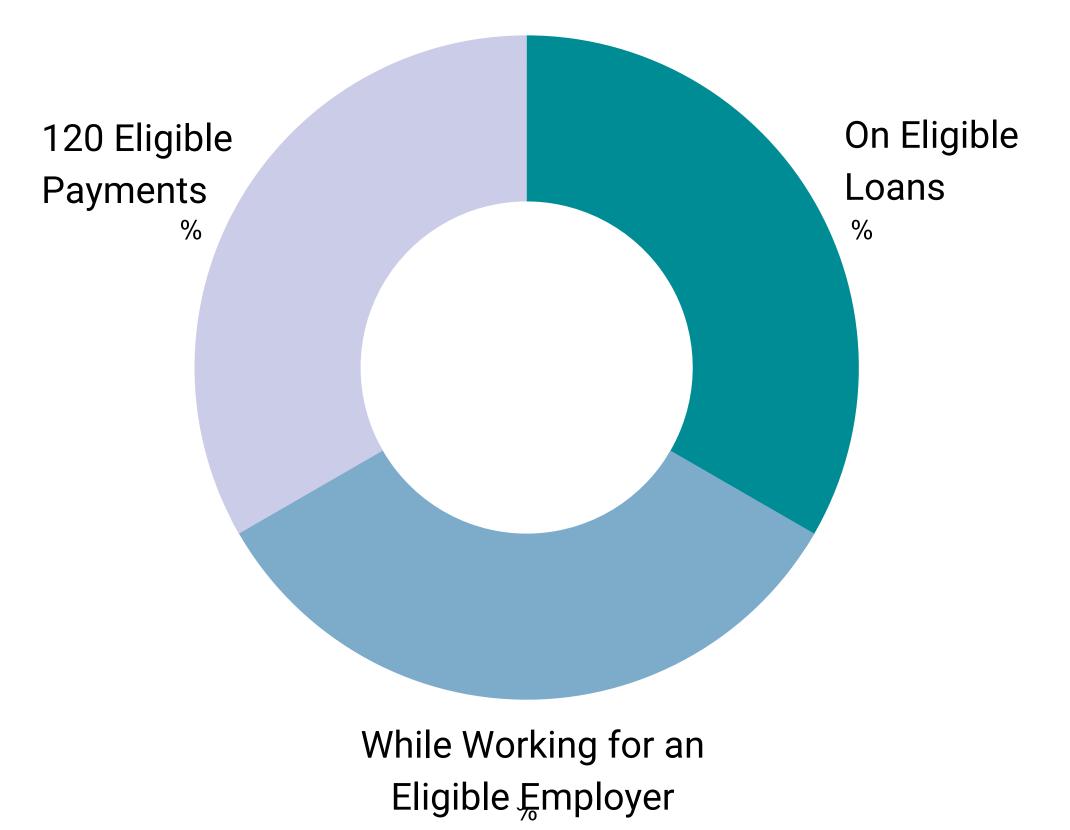




# Public Service Loan Forgiveness

### To Obtain Forgiveness Under Public Service Loan Forgiveness

All of these,
At the Same
Time





# Eligible Loans

- Federal Direct Loans including
- -Subsidized and Unsubsidized Stafford Loans
- -Graduate PLUS Loans
- -Parent PLUS Loans
- -Consolidation Loans
  - Made at any time
  - Any Stafford, PLUS or consolidation loan made on or after July 1, 2010 is a Direct Loan.

### Loans Eligible If Consolidated Under Direct Loans

- Federal Family Education Loan Program Loans including
- -Subsidized and Unsubsidized Stafford Loans
- -Graduate and Parent PLUS Loans
- -FFELP Consolidation Loans
  - Federal Nursing Loans
  - Federal Perkins Loans
  - Health Education Assistance Loans
  - Nurse Faculty Loans
  - Loans for Disadvantaged Students
  - Health Profession Student Loans
  - studentaid.gov to consolidate
  - Payments made prior to consolidation do not count towards PSLF

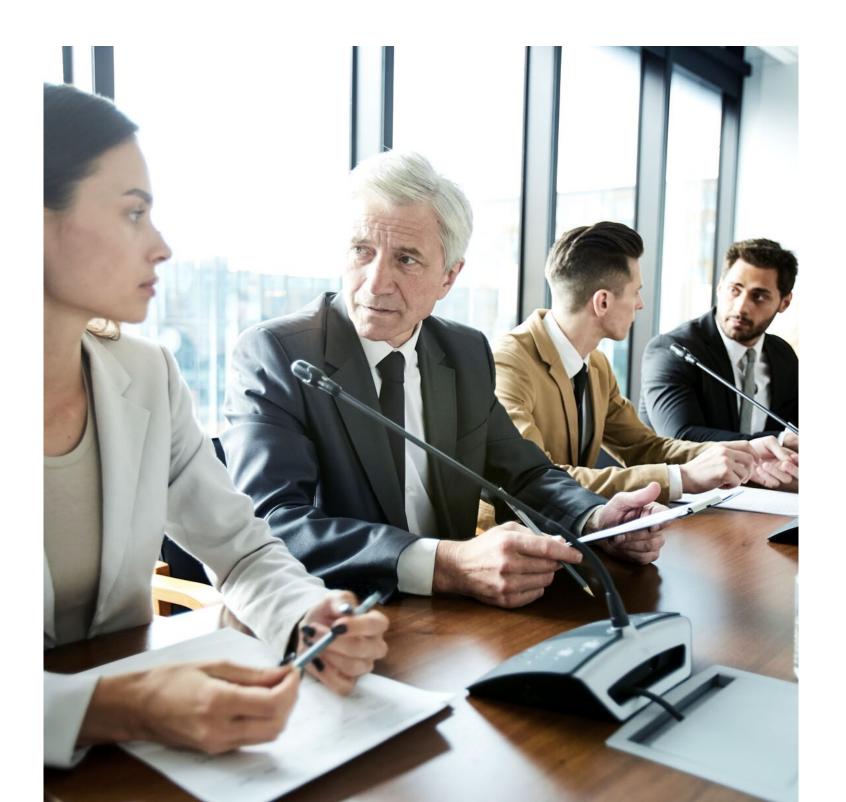




### Eligible Employers

- It doesn't matter what you do, it matters who you work for
- Must be full time as defined by your employer or
- Must be at least 30 hours per week if working part time for multiple eligible employers
- -To verify your employer is eligible, submit the employment certification (ECF) form.
- -Recommend this form be filed annually
  - PSLF Help Tool <u>www.studentaid.gov</u>

### Eligible Employers



- Any government employer including
- -Federal
- -State
- -Local
- -Tribal
- -Contractors are not government employers even if you work in a government building. You must be directly employed by the eligible employer.
  - Serving full time for
- -The military
- -The Peace Corps
- -AmeriCorps

### Eligible Employers

- Any 501(c)(3) non-profit
- Other non-profits whose primary purpose is one of the following:
- -Emergency management
- -Military service: service on behalf of the U.S. armed forces or the National Guard
- -Public safety
- -Law enforcement: crime prevention, control or reduction of crime, or the enforcement of criminal law
- -Public interest law services
- -Early childhood education
- -Public service for individuals with disabilities and the elderly
- -Public health: includes nurses, nurse practitioners, nurses in a clinical setting, and full-time professionals engaged in health care practitioner occupations and health support occupations, as such terms are defined by the Bureau of Labor Statistics
- -Public education
- -Public library services
- -School library or other school-based services



### Non-Eligible Employers

- Labor unions
- Partisan political organizations
- For-profit organizations\*
  - New exception for states where the law prohibits non-profits from certain hiring (TX and CA physicians)
- Not-for-profit organizations that are not tax-exempt under Section 501(c)(3) of the Internal Revenue Code and that do not provide a qualifying public service as their primary purpose



### A Few Things to Remember

- You must be employed by an eligible employer:
- -At the time you make all 120 of your PSLF eligible payments
- -At the time you apply for forgiveness AND
- -At the time the feds review your forgiveness application
  - You do not have to work for the same employer for the entire 120 payments
  - You do not have to have consecutive eligible employment
  - You do not have to have consecutive eligible payments



### Eligible Payments

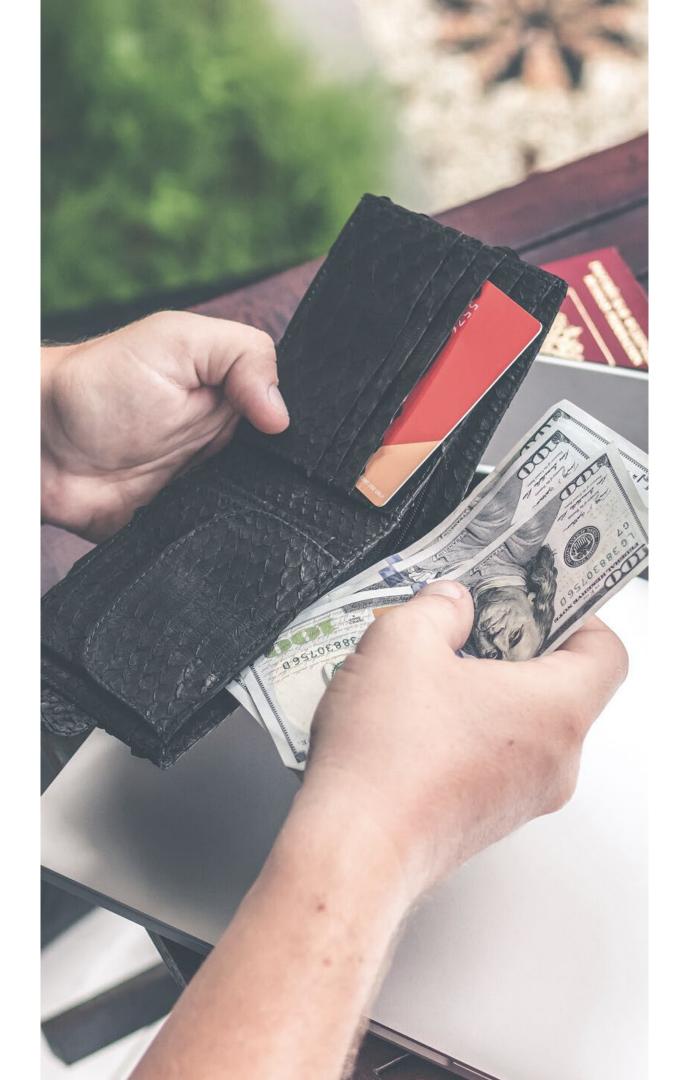
- Must be made on time (within 15 days of the due date)
  - Lump sum payments can now count in limited situations
- Must be made after October 1, 2007
- Cannot be made while in default
- Must be made while working full time for an eligible employer
- Must be made on a federal Direct Loan
- Does not matter who makes the payment



### Eligible Payments

- March 13, 2020 September 30, 2023
   period counts for PSLF purposes even if
   no payment is made
  - Admin forbearances also count
  - Cannot have been in school or in default

- Must still be working full time for an eligible employer
- Can request refund if payments made





### Eligible Payment Plans

- 10 Year Standard repayment
- Income-based repayment
- Pay As You Earn
- Revised Pay As You Earn/SAVE
- Income-contingent repayment
- -This is the only income driven plan Parent PLUS borrowers can use, and only if they consolidate under Direct Loans (unless double consolidated)
  - Does not have to be the same plan for all 120 payments
  - These plans only count if made on Direct Loans

# Other Eligible Periods

- The following will count if the borrower was working eligible employment during the period
  - Cancer treatment deferment;
  - Economic hardship deferment;
  - Military service deferment;
  - Post-active-duty student deferment;
  - AmeriCorps forbearance;
  - National Guard Duty forbearance;
  - U.S. Department of Defense Student Loan Repayment Program forbearance; or
  - Certain administrative forbearances related to local or national emergencies or military mobilizations and or mandatory administrative forbearances provided to borrowers paused while applying for lower payment or other programs

### IDR One-Time Account Adjustment



Is being applied automatically to all Direct Loans.

No application required

https://studentaid.gov/announcementsevents/idr-account-adjustment



ED will give credit towards
IDR/PSLF forgiveness for periods
loans were not on an eligible plan as
well as some deferment and
forbearance periods.



Will give Direct Consolidation Loans credit for the highest payment count of all the underlying loans.

Only for consolidation applications submitted on or before April 30<sup>th</sup>, 2024

Will also give credit for payments made on FFEL loans

# Other Important Changes

- After end of IDR Adjustment, you MUST be on an IDR or Ten-year Standard Plan to accrue eligible PSLF and IDR credits.
- IDR plan:
  - If you are not actively on the PAYE plan as of July 1, 2024, you can never get on, or get back on that plan.
  - > If you have been on REPAYE/SAVE for at least 60 months you cannot get on new IBR.
  - If you are not actively on the ICR plan as of July 1, 2024 you can never get on, or get back on that plan.
- Parent Plus Double Consolidation must be completed by July 1, 2025.

## Examples of Adjustment

#### **Direct Consolidation Loan**

- \$50K in undergraduate loans that have been in repayment for 27 months.
- \$80K in graduate loans that have been in repayment for 3 months.
- New Direct Consolidation
   Loan will be given credit for
   27 months.

#### Direct Loans Not on IDR Plans

- Borrower has been in repayment for 264 months (22 years).
- Has only been on an IDR for 32 months.
- Borrower will automatically be given an IDR count of 264 months and receive immediate forgiveness if no graduate loans or if on PAYE or new IBR.

### PSLF Buy Back

- You can buy back these months only if
  - you still have an outstanding balance on your Direct loan(s),
  - you have approved qualifying employment for these same months, and
  - buying back these months will complete your total of 120 qualifying PSLF payments.
- Available for months in deferment or forbearance where the borrower was working PSLF eligible employment
  - Cannot be used for periods prior to a consolidation
- Cannot be used for periods of
  - Grace period
  - Default
  - In school status
  - Bankruptcy status
  - Disability status
- They will calculate the amount you would have paid if on an income driven plan during those months



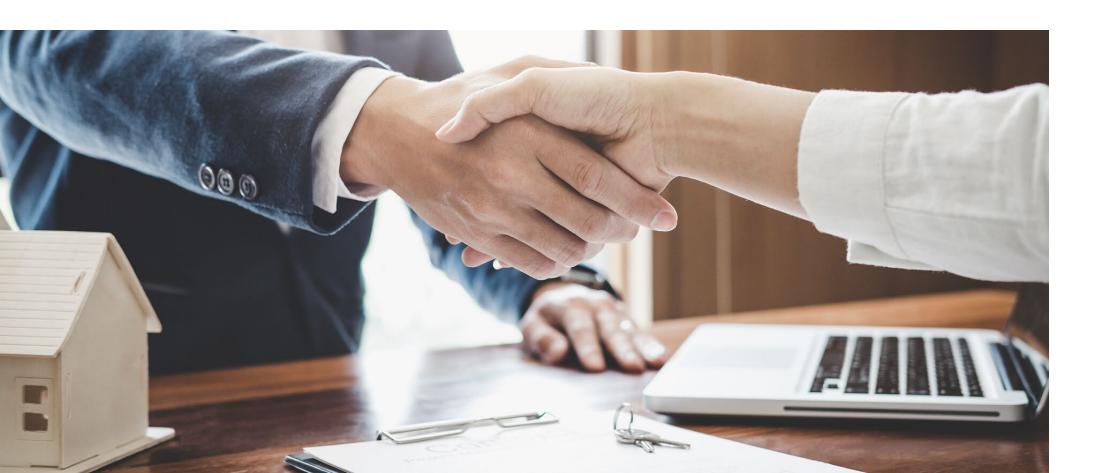


Temporary Expanded Public Service Loan Forgiveness (TEPSLF) AKA: The PSLF "fix"

### Who qualifies/doesn't qualify for the "fix"

### Qualifies

Borrowers who made payments under a graduated, extended or standard consolidation plan



### Does not Qualify

- Borrowers who consolidated after making eligible payments cannot receive credit for these payments
- Borrowers who made payments under a Perkins or Federal Family Education Loan program loan
- Borrowers who made payments while in default, or made payments late
- Borrowers with
- private student loans

### How It Works

- Make 120 qualifying payments while working for a qualifying employer
- -Some or all of these payments may have been made under a graduated, extended or standard consolidation repayment plan
- -The 12th to last payment, as well as the last payment made, must have been at least as much as you would have paid under and income driven repayment plan. FedLoan Servicing will make that determination.

Submit combined ECF, PSLF, TEPSLF form



### How Long Will It Last?

- Congress budgeted \$700 million for the fix on a first come first serve basis
- -Once it's gone, there will be no more granted
  - You cannot apply prior to your 120th payment
  - It is strongly advised such borrowers switch to an income-driven plan immediately unless their IDR amount would be significantly higher.



# How To Apply

# How to Apply

- Submit ten years of ECF forms
- When first is submitted and approved, loans will transfer to MOHELA Servicing
- They will count your eligible payments
- After payment 120, submit the PSLF forgiveness form

Loans will be placed in forbearance during application review

 Any overpayments will be refunded as long as they weren't made prior to a consolidation



# Change in PSLF Processing



PSLF (and TEACH Grant) processing will pause starting May 1, 2024

Recommended borrowers screenshot their current counts



Processing will transfer to other ED vendors and all PSLF processing will start going through the ED only via <a href="www.studentaid.gov">www.studentaid.gov</a> starting July 2024

This will be the only place to see PSLF counts



Overall loan servicing will not change otherwise – PSLF accounts will be able to be at any servicer

You will still make payments to the servicer, etc

### Resources

- www.studentaid.gov
- - The Department of Educations website
- Where to consolidate into Direct Loans
- PSLF Help Tool
- www.freestudentloanadvice.org
  - PSLF explanation
  - Forgiveness database

