

Comments re TEPSLF Information Collection Activities

Docket No: ED-2018-ICCD-0060

The undersigned are members of a broad coalition committed to the preservation of PSLF. (See www.preservepslf.com). We also support TEPLSF, which provides student loan debt relief to certain borrowers who meet the other requirements for PSLF but inadvertently made loan repayments to the wrong plan. We therefore agree that the Department of Education (Department) should be able to request information from student loan borrowers in order to determine whether those borrowers are entitled to loan forgiveness under the new program.

Proper implementation of TEPSLF, however, requires more than information about borrowers. The Department should take steps to ensure that potentially eligible borrowers are not discouraged from applying for forgiveness and that they are treated fairly.

At the outset, it is crucial to emphasize that TEPSLF is not an entitlement program and has limited funding. Debt relief will be provided on a first-come first-served basis based on the date of application; once all the appropriated funds are expended no further relief is possible. The date on which a borrower's application is deemed to be filed for consideration may therefore be significant.

The Department's website and other communications state that borrowers cannot apply for TEPSLF until their application for PSLF has been denied. (See [letter from Senator Kaine and colleagues to the Department of Education](#)). This makes no sense. Many borrowers never filed a PSLF application because they learned from their loan servicer or elsewhere that they were enrolled in a non-qualifying repayment plan. If they cannot file for TEPSLF until their PSLF application is denied, which may take weeks or months, they will be further down the queue than similarly situated borrowers who filed PSLF applications that were doomed to be rejected. The Department should make clear on its website and in other communications that borrowers can apply for TEPSLF and place themselves in line without having had a PSLF application denied. If the Department needs the information contained in PSLF applications, it can ask borrowers who have not previously filed such an application to do so when they file their TEPSLF application. To avoid any confusion, the Department should explicitly state that the PSLF application must be filed even though the borrower believes it would be denied.

TEPSLF contains requirements concerning the amount of loan repayment borrowers need to have made in the 12 months prior to their application for forgiveness. It may take a considerable period of time for borrowers to determine whether they have met these requirements or to meet them prospectively. There is a possibility that some borrowers will

become discouraged and decide that it is too late in the first-come first-served process to apply for TEPSLF.

The Department can address this problem by publishing monthly reports on the processing of TEPSLF applications. Of particular relevance here is information on the total dollar amount that has been forgiven, since this will let borrowers know if there is still an opportunity to have their loans forgiven through the program. The reports should also include the total number of requests received, total number of requests denied, most common reasons for denials, and number of borrowers approved.

Thank you for your consideration of these comments.

AASA, The School Superintendents Association
AccessLex Institute
American Federation of Teachers (AFT)
American Psychological Association
Association of American Veterinary Medical Colleges
Association of School Business Officials International (ASBO)
Association of Schools and Programs of Public Health
Association of Young Americans (AYA)
California Association of Nonprofits
CSWE, Council on Social Work Education
Equal Justice Works
Generation Progress
Higher Ed, Not Debt
Independent Sector
National Asian Pacific American Bar Association (NAPABA)
National Association of Student Financial Aid Administrators
National Association for College Admission Counseling
National Education Association
National Legal Aid & Defender Association
Young Invincibles