

## Public Service Loan Forgiveness (PSLF): New Regulations and Limited-Time Opportunities

6/5/2024

Jessica M. Manfredi, Student Loan Advocate (she/her) Amber Hay, PSLF Advocate (she/her)





## Q&A and Upvoting

- This presentation is being recorded
- Copy of slides will be available
- Chat is disabled for participants used only by panelists to share links & resources
- Participants are on mute
- Enter your questions using the Q&A and vote on questions you would like to have answered live
- Live closed captions available.



#### What is the PSLF program?

How is Washington helping borrowers?

### Questions we will answer:

What steps do I need to take to qualify for PSLF?

How do I apply for PSLF?



Where can I go to get help with my student loans?

## Federal student loan debt in Washington



**790,800** federal student loan borrowers

**\$28.7 billion** outstanding student debt

\$32,498 average student debt

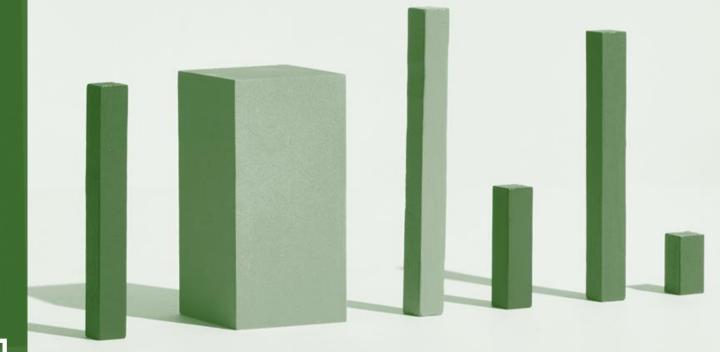
Washington Student Loan Advocate

### What is the PSLF Program?

- Federal debt relief program overseen by U.S.
   Department of Education's Office of Federal Student Aid (FSA)
- Forgives balance on federal student loans after
   10 years of public service employment <u>while</u> making qualifying payments



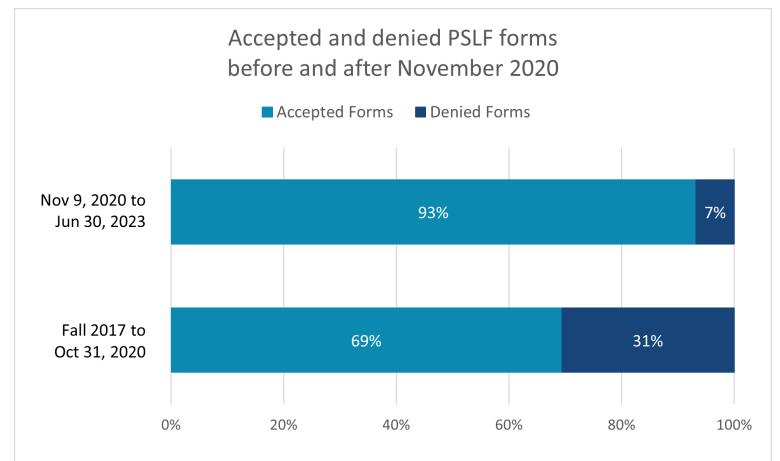
# PSLF in Washington State





# PSLF acceptance rates are improving!

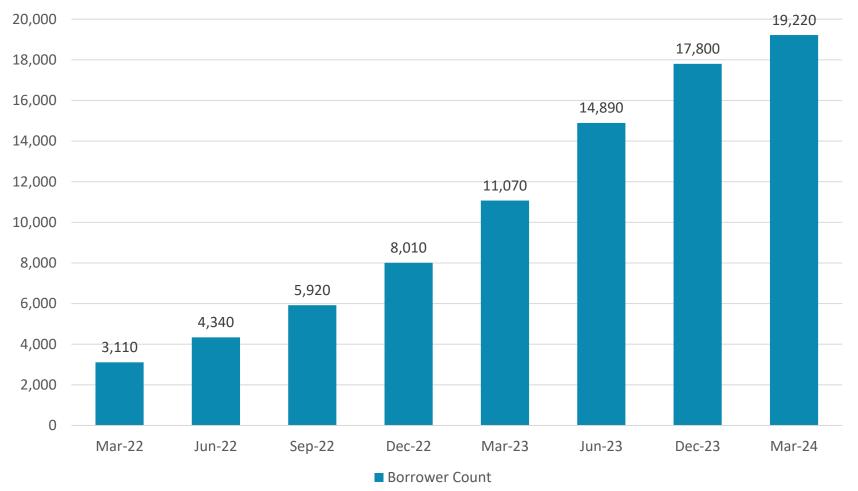




Source: U.S. Department of Education Office of Federal Student Aid. (2022-2023). Public Service Loan Forgiveness Data. https://studentaid.gov/data-center/student/loan-forgiveness/pslf-data.

Washington borrowers are receiving student loan forgiveness!

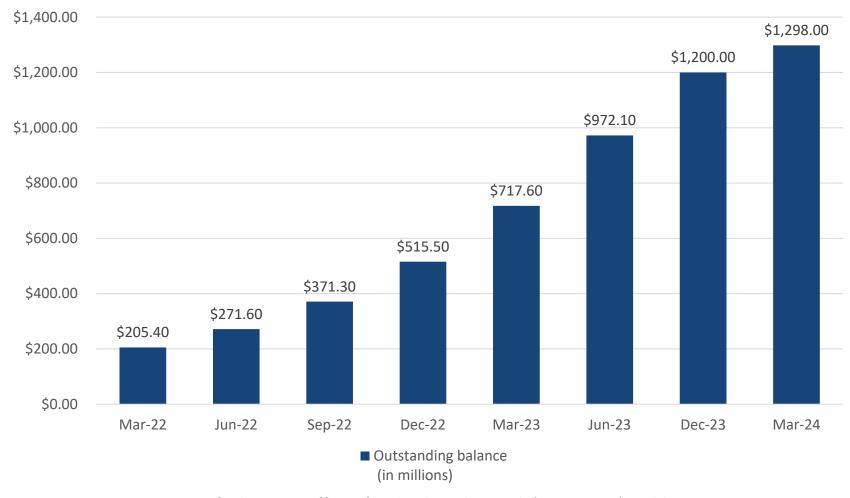
#### Washington borrowers with processed PSLF discharges (PSLF, TEPSLF, and limited waiver) in Washington state



Source: U.S. Department of Education Office of Federal Student Aid. (2022-2024). Public Service Loan Forgiveness Data. <a href="https://www.studentaid.gov/data-center/student/loan-forgiveness/pslf-data">https://www.studentaid.gov/data-center/student/loan-forgiveness/pslf-data</a>.

# Washington borrowers are receiving student loan forgiveness!

#### Amount of loans forgiven in millions (\$) through PSLF (PSLF, TEPSLF, and limited waiver) in Washington state



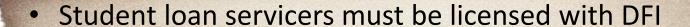
Source: U.S. Department of Education Office of Federal Student Aid. (2022-2024). Public Service Loan Forgiveness Data. <a href="https://www.studentaid.gov/data-center/student/loan-forgiveness/pslf-data">https://www.studentaid.gov/data-center/student/loan-forgiveness/pslf-data</a>.

How is
Washington
helping student
loan borrowers?





## Washington Student Loan Bill of Rights



- Schools must notify student borrowers about Student Loan Advocate
- Develop student borrower education course
- Borrowers may request information or resources or make a complaint to Advocate
- Advocate makes recommendations to legislature regarding student debt in Washington



**Engrossed Senate Bill 6029** 

### Washington PSLF legislation

#### Washington State PSLF Legislation (ESSB 5847 and HB 1950)

- Student Loan Advocate developed PSLF awareness materials for qualifying public service employees
- OFM launched PSLF employment certification program
- Legislative plan for statewide initiative to raise awareness and remove barriers for all public service employees to access the PSLF program due December 1, 2024

Ď

Codified as <u>RCW 28B.77.009</u>, <u>RCW 43.41.425</u>, <u>RCW 41.04.045</u>, and <u>RCW 41.04.055</u>

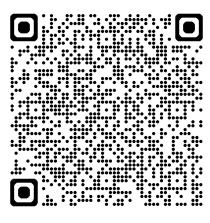
Share your experience as a student loan borrower!





#### Help shape the Washington State PSLF Initiative!

 Complete a survey to share information about your experience and challenges accessing the PSLF program.





To qualify for PSLF you need these 4 things

- 1 Right type of employment
- 2 Right type of loan
- 3 Right type of repayment plan
- 4 Right number of payments



## Which employment qualifies for PSLF?







### Qualifying employment



#### Full time

Directly employed with public employer (W2)

Average of 30+ hours/week

Multiple part-time public service jobs = 30 hours+/week avg

Contractors <u>only</u> if job is prohibited by state law to be provided by direct employees

## Public employer(s)

Any level of government

501c3 nonprofit organizations

Employer more important than role

Must be employed when you apply

### Nonprofit with other tax status

Military service
Public health services
Public education

Public library services Early childhood ed.

Public interest law Disability services

No labor unions or partisan political orgs

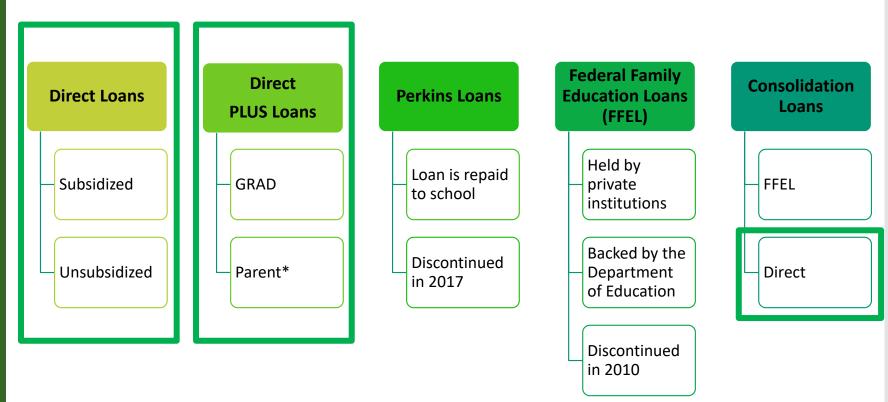
## Which loans qualify for PSLF?







### Eligible federal student loans





\*Direct Parent PLUS borrowers, while eligible for PSLF, are not eligible for any of the Income-Driven Repayment (IDR) plans. Parent PLUS borrowers need to consolidate into a Direct Consolidation loan to get access to IDR.



Apply to consolidate student loans (if needed)



Need to be consolidated into a Direct Consolidation Loan to be eligible for PSLF:

Perkins Loans

Federal Family Education Loans (FFEL)

<u>May</u> need to be consolidated if you'd like to access an Income-Driven Repayment (IDR) plan:

**Direct Parent PLUS** 

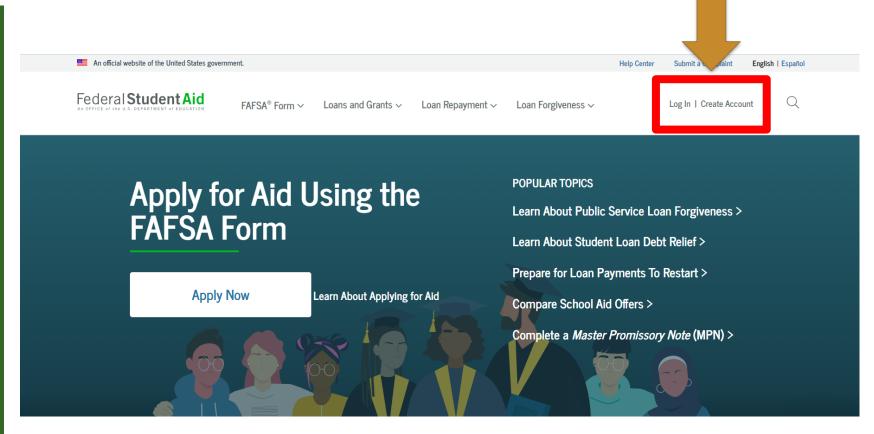
How do I consolidate my loans? | Federal Student Aid

PSLF and Direct Parent PLUS Loans | Student Loan Advocate



Find your federal student loans on FSA website





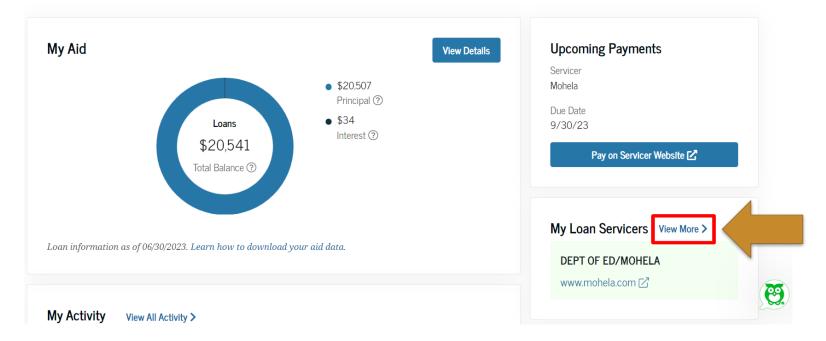
StudentAid.gov



### Find your loan servicer



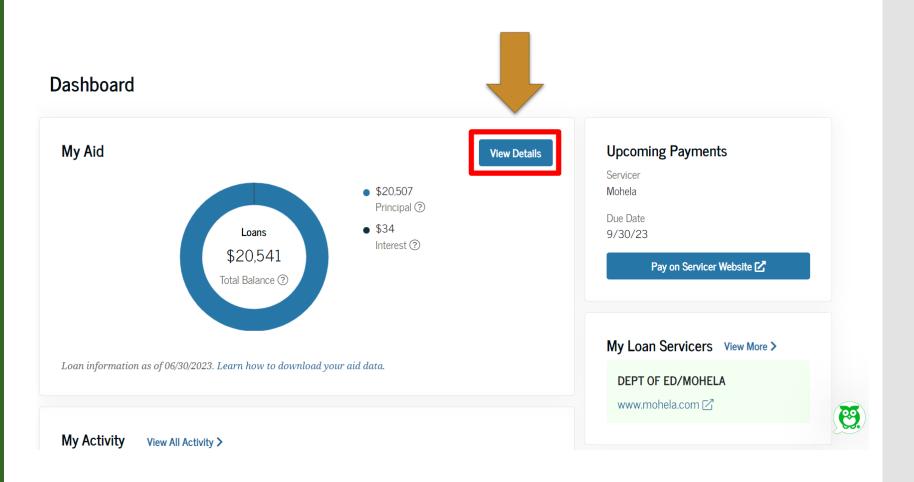
#### **Dashboard**





### View your loan details





# Which repayment plans qualify for PSLF?







#### Choose an eligible repayment plan



#### Repayment plans eligible for PSLF:

- Any Income-Driven Repayment (IDR) plans:
  - Saving on a Valuable Education (SAVE)
  - Income-Based Repayment (IBR)
  - Pay as You Earn (PAYE) not eligible for new enrollments after July 1, 2024.
  - Income-Contingent Repayment (ICR) after July 1, only for Consolidated Loans w/ Parent PLUS
- Non-Income dependent repayment plan:
  - 10-year Standard Repayment plan
    - A limited amount of time on it is OK, but typically not a good strategy long-term

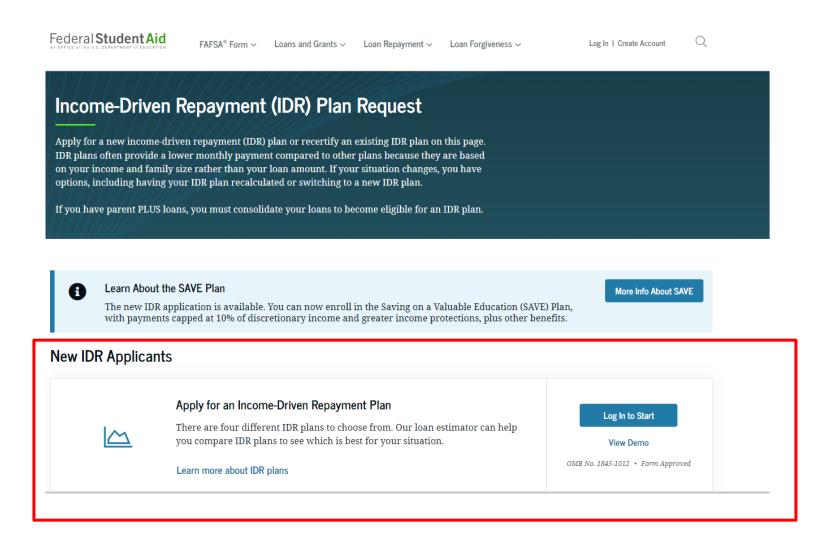
#### Repayment plans <u>not</u> eligible for PSLF:

 30-year Standard Plan (for Consolidated Loans), Graduated and Extended Repayment plans



Choose
a repayment
plan – using the
IDR application





https://studentaid.gov/idr/

## Which payments count towards PSLF?







## Make 120 qualifying payments



#### All 120 payments (about 10 years) must be:

- After October 1, 2007
- while under a qualifying repayment plan, and
- for the full amount due as shown on your bill; or
- when you are in one of the accepted types of deferments or forbearance at any time during that month.

#### All payments **are not** required to be:

- Made consecutively
- Made with one student loan servicer
- Made with one employer

**Tip:** Sign up for automatic debit payments with your loan servicer!



When can you make qualifying payments?



- You can only make a qualifying monthly payment during periods when you have a payment due
- You cannot make a qualifying monthly payment while your loans are in:
  - an in-school status,
  - a grace period,
  - certain types of deferment or forbearance.
- If you are going back to school, you can decline inschool deferment for older loans in some circumstances
  - If you're not sure about waiving in-school deferment,
     contact your servicer to discuss options.



Which deferments & forbearances count towards PSLF?



Cancer treatment deferment

Economic hardship deferment

Military service deferment

Post-active-duty deferment

**AmeriCorps forbearance** 

National Guard Duty forbearance

Department of Defense
Student Loan
Repayment Program
forbearance

Administrative forbearances due to local or national emergencies/military mobilizations

Administrative forbearances for collecting supporting documentation



## COVID-19 Administrative Forbearance



- This is <u>not</u> the same as a general forbearance you request from your servicer
- It is an administrative forbearance that was applied to Direct and other Dept. of Education-held loans
  - March 13, 2020 August 31, 2023
  - Did <u>not</u> include commercially held-FFEL and Perkins loans
- Months during the payment pause will count as qualifying payments for PSLF if you were employed full-time at a qualifying PSLF employer
  - Applies even if you did not submit payments

Defines full-time employment as an average 30 hours per week

New PSLF rules as of July 1, 2023

Requires employers to credit adjunct/part-time faculty with 3.35 hours of work per credit hour taught

Allows qualifying employers to certify employment for contractors handling tasks prohibited to direct employees by State law



Includes certain deferment and forbearance periods in qualifying payment count

## New PSLF rules as of July 1, 2023

Borrowers may now receive PSLF credit on payments that are made late, in installments, or in a lump sum

Borrowers will receive a weighted average of existing qualifying payments toward PSLF when they consolidate their Direct loans on or after June 30, 2024

<u>"Buyback"</u> available for certain forbearance and deferment periods (excludes in-school deferment/grace periods)



Formalized the reconsideration process for PSLF denials

# PSLF Program Transition to Federal Student Aid

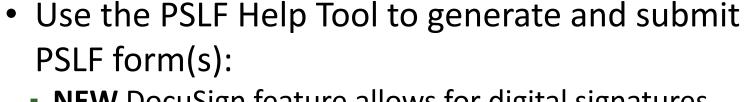
- Beginning May 1, 2024, the PSLF program will be managed by FSA rather than through one loan servicer.
- In the future, you'll be able to:
  - submit your PSLF forms on StudentAid.gov
  - track your progress on StudentAid.gov
  - get support for these programs through FSA's contact centers.
- Between May June 2024, FSA will pause processing any forms for PSLF.
  - You can continue to submit your PSLF forms, but they will be put on hold and not processed until July.

We're Streamlining Your Loan and Grant Web Experience | Federal Student Aid





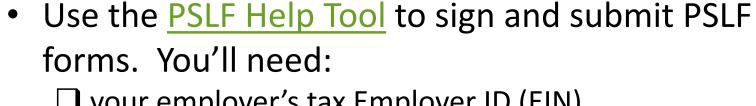
## Use the PSLF Help Tool



- NEW DocuSign feature allows for digital signatures
- Automatically submits form to Federal Student Aid (FSA)
- Remember to submit a PSLF form:
  - every year
  - whenever you switch employers
  - when you switch between full- and part-time employment with the same employer.



#### Certify your employment



- your employer's tax Employer ID (EIN),
- ☐ dates of employment at your employer(s), and
- up your employer's PSLF Contact email address.
- Use the PSLF Directory to find this information for:
  - Washington state agencies
  - Washington public institutions of higher education



# Wait for your PSLF application to be reviewed





- Once your form is processed and eligibility determined, you'll be able to:
  - view eligible and qualifying PSLF payments on <u>StudentAid.gov</u> and
  - access enhanced self-service tools, including program dashboards and status tracking for your forms and applications.
- You'll continue making payments to your current servicer

Take advantage of this limited-time opportunity!





### What is the IDR Account Adjustment?



Certain periods of forbearance and/or deferment will convert to IDR payments for borrowers with:

- ✓ 12 or more consecutive months of forbearance
- √36 or more of total months of forbearance
- ✓ Months in economic hardship or military deferments after 2013
- ✓ Periods of deferment before 2013 (excluding in-school)

Any time spent in repayment will also convert into IDR payments. <a href="Includes">Includes</a> payments made prior to consolidation. <a href="Excludes">Excludes</a> periods of bankruptcy or default.

Any borrowers with loans with eligible time in repayment of at least 20 or 25 years will see automatic forgiveness, even if they are not currently on an IDR plan.

## What is the IDR Account Adjustment?



These additional IDR payments may count as PSLF qualifying payments if you worked for a qualifying public employer during that period

Includes Direct Parent PLUS Loans

Loans that hit forgiveness thresholds have started to be forgiven this year.

Final IDR/PSLF credits may not be applied until 2024

While most people will get the payment adjustment automatically, some may need to act <u>before</u> June 30, 2024, to fully take advantage of this opportunity!

• Watch <u>our recorded webinar on the IDR Account Adjustment/ IDR Recount</u> for more details.

Who may benefit from consolidating before June 30, 2024?





You have **commercially-held** FFEL, Perkins, or Health Education Assistance Loan (HEAL) Program loans. These loans will be listed with only the servicer's name on your StudentAid.gov account.



You have ED-held FFEL, Perkins, Health Education Assistance Loan (HEAL) Program loans and want to qualify for PSLF. These Loans will be listed as "Dept of ED/Servicer Name" on your the StudentAid.gov account.



You have loans with different periods in repayment.



Break: entered repayment



In-School



Entered repayment again

Washington Student Loan Advocate

Why someone may consider consolidating before June 30, 2024?



- Apply to consolidate before June 30, 2024:
  - Retain 100% of your PSLF or IDR credit
  - PSLF counts temporarily reset to 0, but will be adjusted
  - Direct Consolidation loan will be credited with at least the same number of qualifying payments as your oldest loan.

#### **Example:**

Older sub loan w/ 80 payments



Newer sub loan w/ 60 payments



New consolidated loan w/ 80 payments

- Apply to consolidate on or after <u>June 30, 2024:</u>
  - Newly consolidated loans will be credited with a weighted average of the qualifying payments you made to those Direct Loans.



## What's happening at the federal level?



- Get out of default with <u>Fresh Start</u> ends September 2024!
- New Saving on a Valuable Education (<u>SAVE</u>) repayment plan
  - Forgiveness in 10 years if total original balance < \$12,000</li>
- MOHELA is <u>changing platforms</u>
- Major servicer transfers:
  - FedLoan Servicing (PHEAA) → MOHELA
  - Navient → Aidvantage
  - Great Lakes → Nelnet
  - OSLA → Aidvantage
  - So Your Loan Was Transferred, What's Next? | FSA



### Student Loan Advocate Resources

- Steps to Apply for PSLF, frequently asked questions, webinars, and more at the <u>Student Loan Advocate's PSLF</u> webpage
- <u>Subscribe for PSLF updates</u> from the Student Loan Advocate
- <u>Submit questions or complaints</u> to Student Loan Advocate
  - Make sure to select "Student Loan Questions and Complaints Form"
  - Currently, wait time for a response is about 6-8 weeks



### Let us know how we're doing!

Please fill out a <u>survey</u> and help us continue providing resources for WA student loan borrowers.







# Upvote questions to show your interest

- Typically, we're unable to answer all the questions in the Q&A.
- Please upvote questions you would like to hear the answer to.
   Questions with more upvotes will be answered first!
- To upvote questions, click the Q&A button at the bottom of your screen.



 View the open questions and click the **Thumbs Up** button.



