



3/30/2020

Docket No.: ED-2020-SCC-0021
Director of the Information Collection Clearance
U.S. Department of Education
400 Maryland Ave. SW, LBJ, Room 6W-208-D
Washington, DC 20202-4537

On behalf of the member institutions of the National Association of Student Financial Aid Administrators (NASFAA), I am writing to offer our comments on the proposed Application and Employment Certification for Public Service Loan Forgiveness form. NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at approximately 3,000 colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.

We appreciate and applaud the administration's decision to attempt to simplify, through consolidation, the Public Service Loan Forgiveness (PSLF) program by creating a new, single form combining the application and employment certification forms for the PSLF program and the temporary program designed by Congress in 2018 to assist borrowers whose requests for debt relief under the PSLF program were rejected.

That being said, we believe the form - and the borrowers who will use it - could profit from the following modifications.

Certification Language

This form lacks an option for borrowers who want to submit an Employment Certification Form solely to determine whether they are employed at an eligible employer and can begin making payments toward PSLF. We therefore believe the form should include a checkbox that reads something similar to, "I am submitting an employer certification for the first time", or updating the current checkbox to read, "I don't think I qualify for forgiveness right now. I want to find out how many qualifying payments I have made, or I want to submit new or updated employment certification information".

Order of Information

We believe the consolidated form should list the "I understand that:" portion of Section 2 first, before a borrower completing the form makes their request. This reordering would prompt the borrower to ensure they are aware of the requirements for loan forgiveness under this program before checking any of the boxes.

We appreciate the opportunity to offer these comments and we look forward to working with you on this important issue.

Regards,

A handwritten signature in black ink, appearing to read 'J. Draeger', with a long horizontal flourish extending to the right.

Justin Draeger, President & CEO