

Proposed language to protect borrowers currently working toward PSLF. The negotiators representing Financial Aid Administrators at Postsecondary Institutions and Public Institutions of Higher Education, Including HBCUs, Tribal Colleges, and Minority-Serving Institutions would like to express concern for the impact on individuals who are currently serving in the public sphere at a qualifying employer. It seems contrary to the intent of the EO to punish individuals while attempting to change institutional behavior. We request a legacy clause that would ensure that employees who have been working towards forgiveness at a currently approved employer, some of whom may be very close to the 120 benchmark, to finish their obligation to repayment without having to change employers.

We propose to add a simple clause to the regulatory text that allows current borrowers in repayment to finish their service so long as their employer was classified as an eligible entity prior to the enactment of these new regulations.

Language to insert: Borrowers who were actively in repayment with a qualifying employer prior to the enactment of these regulations will remain eligible for Public Service Loan Forgiveness with continuous employment and repayment status even if their employer becomes classified as ineligible upon enforcement of the new regulations.

We are not married to this language, but hope that the general concern to shelter the individual from harm and focus on the entity comes through; and would also entertain including this in any preamble language as well.

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