
MEMORANDUM

September 17, 2021

TO: Interested Parties
FROM: Student Borrower Protection Center and National Association of Social Workers
RE: **Social Worker Voices from the Department of Education’s RFI on PSLF**

Introduction

In July 2021, the U.S. Department of Education (ED) published a notice and request for information seeking public comment on a range of issues related to the mismanagement of the Public Service Loan Forgiveness (PSLF) program. In the few weeks since launching this public inquiry, ED has received more than 41,000 comments from affected student loan borrowers and other stakeholders, offering new insight into the myriad failures of the scandal-plagued program. The following memorandum offers a brief overview of the unique challenges facing one segment of these student loan borrowers: social workers. Enclosed with this memorandum is a series of illustrative borrower narratives submitted to ED that demonstrates the scope and breadth of these issues.

Overview & Discussion

The nation’s 700,000+ social workers are an essential workforce that routinely works in high-need communities, provides support to vulnerable children and adults, and conducts policy-related work aimed at improving the conditions of society as a whole. Social workers provide critically needed services to millions of Americans every day in a broad range of settings including healthcare facilities, schools, child welfare, community agencies, correctional institutions, and private practice. As the largest provider of mental health services in the US, the value of this work has remained especially visible during the COVID-19 pandemic. As an essential workforce, social workers continue to serve on the frontlines helping communities directly affected by the pandemic, delivering behavioral health services to individuals in crisis, and in many cases risking their lives to ensure that care remains accessible for those in need of assistance.

Despite the incredibly valuable service that social workers provide, access to student loan debt relief remains out of reach for this workforce. Even after obtaining a Masters of Social Work (MSW), which is a terminal degree to practice independently, countless professionals remain locked in the entrapment of perpetual student loan debt. This economic stress is especially felt within this racially and economically diverse profession that is more likely to be populated by first-generation students of color who stand to inherit a disparate share of student loan debt.

The Council on Social Work Education and the National Association of Social Workers survey data reflect that MSW students have on average between \$68,000- \$76,000 total student loan debt.¹ Recent new graduate data indicates that social workers of color are carrying much higher student loan debt than their white peers, with Black social work graduates' total student loan debt at approximately \$92,000 and Hispanic graduates at \$79,000.² The student loan debt burden carried by social workers is further compounded by the low salaries and compensation afforded to the workforce. The aforementioned survey of new social work graduates also indicates that starting salaries for MSW graduates remain very low at approximately \$47,000 annually. Notably, the overwhelming majority of social workers are women, deepening an unresolved gender pay gap.

Failure to address the student loan crisis faced by social workers will continue to economically harm those in practice and will dissuade prospective social workers from entering the field because the cost of answering the call to serve is too great. The potential compromise of this profession's ability to recruit and retain its workforce arrives at a time when the demand for mental health services has doubled as a result of the COVID-19 pandemic, with 4 in 10 adults in the US reporting symptoms of anxiety or depression.³ Added to this, rates of substance abuse, overdose, intimate partner violence, housing instability, and economic distress continue to increase.

Of course, as the following pages make clear, the consequences of breakdowns around PSLF cannot be captured in a rejection rate or an average loan balance. Enclosed is a selection of borrower narratives illustrating the human toll that widespread illegal and incompetent servicing practices have had on social workers with student loan debt.

¹ Council on Social Work Education and National Association of Social Workers. (2020). The social work profession: Findings from three years of surveys of new social workers. <https://www.cswe.org/CSWE/media/Workforce-Study/The-Social-Work-Profession-Findings-from-Three-Years-of-Surveys-of-New-Social-Workers-Dec-2020.pdf>

² Id.

³ Panchal, N., Kamal, R., Cox, C., & Garfield, R. (2021). The Implications of COVID-19 for Mental Health and Substance Use. Kaiser Family Foundation. <https://www.kff.org/coronavirus-covid-19/issue-brief/the-implications-of-covid-19-for-mental-health-and-substance-use/>

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I am a Social Worker who took out \$75,000 in loans from the University of Michigan for my Master's Degree and rolled over a smaller loan from my Undergraduate Degree at Albion College. For me, the problem is the interest rate. I am hoping to use PSLF, but it is concerning to see that after 7 years (paused at pandemic forbearance) of on time, monthly payments, I now owe more than I did when I graduated. I have paid \$34,249 (\$4322 on the principal) during the past 7 years but now owe \$78,489. Through my IBR Plan, I was told to pay \$640/month beginning April 2020 (previously it was \$458/month) my husband also pays \$650/month (he does not qualify for PSLF and also has \$70,000 in Undergraduate Loans), and we have 2 kids in daycare. With such an expense (student loans) that grows each month despite our efforts, we feel like we can never get ahead and start saving for our daughter's education.

The way that payments have been tracked has rarely been smooth and I have had to call FedLoan Servicing annually to correct their tracking of my payments. They have at times dispersed them unevenly between my subsidized and unsubsidized loans which I think has led to the growing debt (along with the interest rate). I also have my account set to autopay for the amount owed and looking back at my payment history it appears that some months they accepted less of my payment because my autopay was set to more than I owed so when I overpaid, it auto underpaid for the next month. I worry that when I apply for forgiveness in June 2023, they will find me ineligible.

I please ask that you consider granting loan forgiveness now for anyone who has previously submitted an employment certification form to track their progress in the PSLF program. These are individuals who think they are being granted it at some point in the future, and it would relieve so much financial stress and allow us to start saving for our children.

Thank you for taking time to look into this matter.

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Aug 4, 2021

Comment

President Joe Biden,

The Public Service Loan Forgiveness program is broken. It was a simple but powerful idea: borrowers working in public service would have their remaining student debt forgiven after 10 years. However, year after year, the Department of Education has rejected 98 out of every 100 public service workers who have applied to have their debts cancelled. I am just one of these student loan borrowers who teach in our schools, serve our country, and have shouldered the burden of keeping us safe on the front lines of the COVID-19 pandemic. In exchange for our commitments to public service, we were promised that our student debt would be erased—a promise the Biden Administration should keep.

The student debt crisis also disproportionately hurts women and borrowers of color, magnifying inequality caused by a history of discrimination across the economy. The failure of PSLF isn't just a broken promise, it is also a missed opportunity to address racial and gender inequity and deliver on President Biden's promise to build back better.

President Biden and Education Secretary Cardona must immediately deliver student debt relief to public service workers.

For me and all borrowers who have worked for a decade in public service, President Biden and the Department of Education should immediately discharge all of their federal student loans in full. Every borrower should immediately get credit for every month spent in public service, regardless of the type of federal student loan, payment plan, or other so-called requirements. Red tape and bureaucratic hurdles should not be a barrier to action—the Secretary should use all legal tools available to eliminate these unjust debts.

It is time for the Biden Administration to keep the promise to public service workers and eliminate this debt.

I am a social worker. I have been for 20 years. In my filed, it

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President Joe Biden,

I graduated with my MSW May 2008 and immediately started work for a non-profit organization. I was aware of the PSLF program and intended to apply for it in 10 year when I became eligible. I will admit, I did not do my due diligence to learn all of the requirements but in 2008 it was far more difficult to find the requirements for this program. I entered repayment 11/2008 with a total loan balance of \$52,785.88. I contacted my loan provider about payment options and was told the graduated repayment program was "the same" as an income based repayment option with the main difference of not having to re-certify every year. I selected this option and made on time monthly payments each month. I was struggling with my payments and contacted them again. I was told consolidating my loans could lower my payments, so 1/2011 I consolidated my debt. I was not informed that this would restart the clock on PSLF payments. I again was placed into a graduated payment arrangement on my new consolidated loans.

In 8/2014 I started a new job. I decided to college employment verification's from my old employers to make the process easier in 11/2008 when I anticipated becoming eligible for forgiveness. When I supplied these to my loan provider, I was told I had made 0 eligible payments. I contacted them and was told that the problem was that I had been in a graduated payment plan, which was not eligible. I immediately changed into a income based repayment plan. I looked at my prior years income and found that if I had been in an income based repayment plan the entire time my payments would have been hundreds of dollars less expensive every month, for some years my payment would have been \$0 instead of \$323.

In 2018 I learned of the temporary expansion of the public service loan forgiveness program. After I made my 120th payment in 11/2018, I applied for TEPSLF.

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President Joe Biden,

I am in year 8 of pslf eventhough I have worked in non-profit or public school for the past 15 years. I am stuck in a low paying job because I am holding out to have my \$100k forgiven. I've been waiting 3 months for a response to my last employment verification. The date keeps changing eventhough my employment has not. I'm terrified I will stay in this low paying position for 3 more years only to be denied.

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Comment

President Joe Biden,

The Public Service Loan Forgiveness program is broken. It was a simple but powerful idea: borrowers working in public service would have their remaining student debt forgiven after 10 years. However, year after year, the Department of Education has rejected 98 out of every 100 public service workers who have applied to have their debts cancelled. I am just one of these student loan borrowers who teach in our schools, work in our hospitals, serve our country, and have shouldered the burden of keeping us safe on the front lines of the COVID-19 pandemic. In exchange for our commitments to public service, we were promised that our student debt would be erased— a promise the Biden Administration should keep.

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I myself am a woman who has two graduate degrees, one in psychology, and one in social work, and I have spent my entire career in the non-profit sector working to help the disenfranchised as well as those who need help advocating for themselves. Historically, and currently, these jobs do not pay the equivalent of other master level degrees due to societies underpaying female dominated careers. Even while I have 10 years of higher education and have worked tirelessly to ensure the safety of our society I have to work three jobs in order to pay my bills and my student loans. I also work as an adjunct professor at the college level as well as provide therapy on the side from my regular 9-5 job. I have attempted to apply for the loan forgiveness for those working for non-profits however even though I have