



September 2018

PUBLIC SERVICE LOAN FORGIVENESS

Education Needs to Provide Better Information for the Loan Servicer and Borrowers

GAO Highlights

Highlights of [GAO-18-547](#), a report to congressional requesters

Why GAO Did This Study

Starting in September 2017, the first borrowers became eligible and began applying to have their loans forgiven through the PSLF program. GAO was asked to review the PSLF program.

This report examines the (1) number of borrowers pursuing PSLF and the extent to which Education has conducted outreach to increase borrower awareness of program eligibility requirements, and (2) extent to which Education has provided key information to the PSLF servicer and borrowers. GAO analyzed data from the PSLF servicer on employment and loan certifications and loan forgiveness applications as of April 2018; reviewed Education's guidance and instructions for the PSLF servicer; assessed the information used by Education and the PSLF servicer and communicated to borrowers against federal internal control standards; and interviewed officials from Education and the four largest loan servicers, including the PSLF servicer.

What GAO Recommends

GAO recommends that Education (1) develop a timeline for issuing a comprehensive guidance and instructions document for the PSLF servicer, (2) provide the PSLF servicer and borrowers with additional information about qualifying employers, (3) standardize payment information other loan servicers provide to the PSLF servicer, and (4) ensure borrowers receive sufficiently detailed information to help identify potential payment counting errors. Education agreed with GAO's recommendations.

View [GAO-18-547](#). For more information, contact Melissa Emrey-Arras at (617) 788-0534 or emreyarras@gao.gov.

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Education Needs to Provide Better Information for the Loan Servicer and Borrowers

What GAO Found

As of April 2018, over a million borrowers had taken steps to pursue Public Loan Service Forgiveness (PSLF) from the Department of Education (Education), but few borrowers have been granted loan forgiveness to date. The PSLF program, established by statute in 2007, forgives borrowers' federal student loans after they make at least 10 years of qualifying payments while working for certain public service employers and meeting other requirements. Over 890,000 borrowers have passed a first step towards potentially qualifying for PSLF by voluntarily having their employment and loans certified as eligible for PSLF as of April 2018, according to data from Education's PSLF loan servicer. While borrowers first became eligible to apply for loan forgiveness in September 2017, few applicants had met all requirements as of April 2018, with 55 borrowers having received loan forgiveness (see figure). Education has used various outreach methods to inform borrowers about PSLF, but the large number of denied borrowers suggests that many are still confused by the program requirements. A recently enacted law requires Education to conduct additional outreach to help borrowers understand how to meet program requirements.

PSLF Certification Requests and Forgiveness Applications, as of April 2018



Source: GAO analysis of data from the Public Service Loan Forgiveness (PSLF) servicer. | GAO-18-547

Education does not provide key information to the PSLF servicer and borrowers.

- **Guidance and instructions:** Education provides piecemeal guidance and instructions to the PSLF servicer it contracts with to process certification requests and loan forgiveness applications. This information is fragmented across the servicing contract, contract updates, and hundreds of emails. As a result, PSLF servicer officials said their staff are sometimes unaware of important policy clarifications. Education officials said they plan to create a comprehensive PSLF servicing manual but have no timeline for doing so.
- **Qualifying employers:** Education has not provided the PSLF servicer and borrowers with a definitive source of information for determining which employers qualify a borrower for loan forgiveness, making it difficult for the servicer to determine whether certain employers qualify and for borrowers to make informed employment decisions.
- **Qualifying loan payments:** Education does not ensure the PSLF servicer receives consistent information on borrowers' prior loan payments from the eight other federal loan servicers, which could increase the risk of miscounting qualifying payments. Borrowers also lack sufficiently detailed information to easily identify potential payment counting errors that could affect their eligibility for loan forgiveness.

These weaknesses are contrary to federal internal control standards for using and communicating quality information, creating uncertainty for borrowers and raising the risk some may be improperly granted or denied loan forgiveness.

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Abbreviations

Direct Loan	William D. Ford Federal Direct Loan
Education	U.S. Department of Education
PSLF	Public Service Loan Forgiveness

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September 5, 2018

The Honorable Robert C. "Bobby" Scott
Ranking Member
Committee on Education and the Workforce
House of Representatives

The Honorable Susan A. Davis
Ranking Member
Subcommittee on Higher Education and Workforce Development
Committee on Education and the Workforce
House of Representatives

Starting in September 2017, borrowers began applying to have their federal student loans forgiven through the Public Service Loan Forgiveness (PSLF) program. This program, established by law in 2007, is intended to encourage individuals to enter and continue careers in public service by forgiving borrowers' remaining federal student loan balances after they have made at least 10 years of loan payments while working in public service and meeting other requirements.¹ Only loans provided through the William D. Ford Federal Direct Loan (Direct Loan) program qualify for forgiveness. The Department of Education (Education) manages the PSLF program and contracts with a single loan servicer to handle day-to-day activities associated with the program, which include responding to borrower inquiries, making preliminary determinations about whether borrowers' employment and loans qualify for PSLF, and processing loan forgiveness applications.²

Although borrowers are now applying for loan forgiveness through the program, little is known about the processes for assessing borrower eligibility and whether these processes ensure consistent services to borrowers and safeguard taxpayer funds. In light of these issues, you asked us to review the PSLF program.

¹ The PSLF program was established by the College Cost Reduction and Access Act, Pub. L. No. 110-84, § 401, 121 Stat. 784, 800 (2007), as amended by the Higher Education Opportunity Act, Pub. L. No. 110-315, § 451(b), 122 Stat. 3078, 3262 (2008) (codified at 20 U.S.C. § 1087e(m)).

² The Pennsylvania Higher Education Assistance Agency's FedLoan Servicing unit is the exclusive servicer for borrowers pursuing PSLF.

This report examines (1) the number of borrowers pursuing PSLF and the extent to which Education has conducted outreach to increase borrower awareness of program eligibility requirements, and (2) the extent to which Education has provided key information to the PSLF servicer and borrowers.

To address these questions, we conducted our review of the PSLF program using the following approaches:

- To examine the number of borrowers pursuing PSLF, we analyzed the most recent available data from the PSLF servicer on the volume of borrower requests to have their employment and loans certified as eligible and loan forgiveness applications, including approvals, going back to when these processes were established by Education. Specifically, we analyzed data on employment and loan certification requests from January 2012 through April 2018, and data on loan forgiveness applications from September 2017 through April 2018. We also analyzed data on the reasons why borrowers were denied certification and loan forgiveness. We assessed the reliability of these data by reviewing data system documentation from the PSLF servicer and interviewing knowledgeable officials, and we determined that the data were sufficiently reliable for our reporting purposes. To assess Education's outreach to borrowers about eligibility requirements, we reviewed the program documents and information that Education and the PSLF servicer provide to borrowers, and interviewed Education officials. To identify common questions borrowers have about these requirements, we interviewed officials from the four largest federal student loan servicers, including officials and frontline staff from the PSLF servicer. We examined a 2017 Consumer Financial Protection Bureau report on borrower complaints, including those related to the PSLF program. We assessed Education's outreach efforts against the department's objective in its strategic plan for fiscal years 2018 through 2022 to improve the quality of service for customers across the entire student aid life cycle.
- To examine key information Education has provided to the PSLF servicer and borrowers, we reviewed Education's processes for providing and sharing information and assessed them against federal internal control standards for communicating with external parties and using quality information. We reviewed the various methods Education uses to provide guidance and instructions to the PSLF servicer, including the servicing contract, contract updates, and emails. We examined the main information sources used by the servicer to evaluate employer eligibility and reviewed its process for

obtaining prior loan payment information from other loan servicers. We also reviewed the information that Education and the PSLF servicer provided to borrowers about qualifying employers and payments. We interviewed Education officials and the PSLF loan servicer's management and frontline staff. We reviewed Education's monitoring reports on the PSLF servicer's operations and the PSLF servicer's internal handbook for processing employment and loan certifications and forgiveness applications.

For both objectives, we also reviewed relevant federal laws and regulations. In addition, at the time of our review, there was ongoing state and federal litigation related to the administration of the PSLF program.³ Therefore, we scoped our study to minimize overlap with issues pending in litigation. For example, we did not assess any individual borrower eligibility determinations or qualifying loan payment counts made by the PSLF servicer. As a result of this approach, our findings do not draw any conclusions about how individual borrowers or employers may have been affected by any of the program administration issues addressed in this report.

We conducted this performance audit from August 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Education administers federal student aid programs, including the Direct Loan program, through the Office of Federal Student Aid. Under the Direct Loan program, Education issues and oversees the loans while contractors service them. Education currently contracts with nine loan servicers that each handle the billing and other services for a portion of the over \$1 trillion in outstanding student loans provided through the

³ Among others, see *Commonwealth v. Pa. Higher Educ. Assistance Agency*, No. 1784-2682 (Mass. Super. Ct. filed Aug. 23, 2017); *Am. Bar Ass'n v. U.S. Dep't of Educ.*, No. 16-2476 (D.D.C. filed Mar. 23, 2017); *Morris v. Pa. Higher Educ. Assistance Agency*, No. 18-31 (E.D. Pa. filed Jan. 8, 2018). These lawsuits were still pending as of August 15, 2018.

Direct Loan program.⁴ These servicers track and manage day-to-day servicing activities, and they report key information on the status of each loan to Education’s central student loan database. In 2011, Education contracted with one of its existing loan servicers to become the single servicer for borrowers pursuing PSLF. The PSLF servicer is responsible for processing certification requests and forgiveness applications, as well as servicing the loans of borrowers who have met basic PSLF eligibility requirements.

The PSLF program provides eligible borrowers with forgiveness on the remaining balance of their Direct Loans after they have met program requirements.⁵ To receive forgiveness for a loan, borrowers are required to be employed by a qualifying employer when making 120 qualifying payments, at the time they apply for forgiveness, and at the time they receive forgiveness for their loans.⁶ Specifically, borrowers are required to:

- Work full-time for a public service organization, such as⁷
 - a government organization, agency, or entity at any level (federal, state, local, or tribal);
 - a nonprofit, tax exempt organization (under section 501(c)(3) of the Internal Revenue Code); or

⁴ Prior to 2009, Education used a single contractor to handle all loan servicing. This company is no longer servicing federal loans, and its loan portfolio has been redistributed among the current loan servicers.

⁵ All types of Direct Loans are eligible for forgiveness, including Direct Subsidized Loans, Direct Unsubsidized Loans, Direct Graduate PLUS Loans, and Direct Consolidation Loans. Parent PLUS Loans are also eligible for forgiveness, but cannot be repaid under any of the income-driven repayment plans unless these loans are consolidated into a new Direct Consolidation Loan. Borrowers may also consolidate certain federal loans that are not eligible for PSLF, such as loans under the Federal Family Education Loan program and Perkins loans, into a single Direct Consolidation Loan to qualify for PSLF. However, only the post-consolidation payments count toward the 120 payments required for PSLF.

⁶ See 34 C.F.R. § 685.219 for the regulations governing the PSLF program.

⁷ For purposes of this report, we refer to these organizations as “qualifying employers” or “qualifying employment.” Serving in a full-time AmeriCorps or Peace Corps position also counts as qualifying employment for the PSLF program. Certain types of employment are not eligible for PSLF; for example, work as a member of Congress, work for labor unions, work for partisan political organizations, and some activities performed for religious organizations. Borrowers working part-time for more than one qualifying employer at the same time are considered full-time for PSLF purposes as long as their combined work hours average at least 30 hours per week.

-
- another private nonprofit organization that provides certain public services.
 - Not be in default and be repaying their loans through an income-driven repayment plan (in which borrowers' monthly payments are based on their income and family size); the 10-year Standard repayment plan; or another plan if the monthly payment amounts equal or exceed the amount the borrower would have paid under the 10-year Standard repayment plan.⁸ Although the 10-year Standard repayment plan qualifies for PSLF, borrowers in this plan will pay off their loans before they are eligible for forgiveness unless they change to an income-driven repayment plan that leaves them with a balance remaining to be forgiven after 120 payments.⁹
 - Make 120 on-time monthly loan payments for the full amount due on their bill after October 1, 2007. These monthly payments do not need to be consecutive.

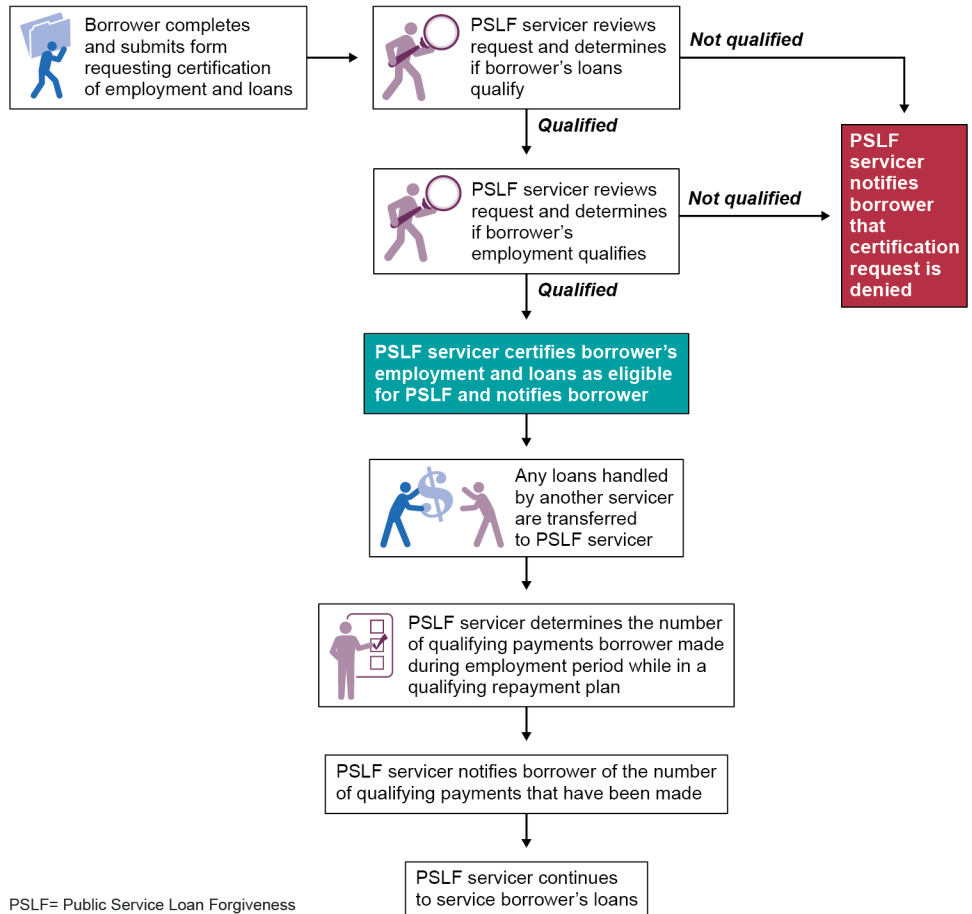
In January 2012, Education began offering a voluntary process to certify borrowers' public service employment and loans as eligible for PSLF. Borrowers can request to have their employment and loans certified at any time to make sure they are meeting basic program requirements and are on track towards qualifying for loan forgiveness (see fig. 1). Once a borrower submits a request, the PSLF servicer reviews the borrower's employment and loans to determine if they qualify, and if so, counts how many qualifying payments the borrower has made.¹⁰

⁸ Education offers five income-driven repayment plans to eligible borrowers: Pay As You Earn, Revised Pay As You Earn, two Income-Based Repayment plans, and Income-Contingent Repayment.

⁹ Borrowers who make 120 monthly payments under the 10-year Standard repayment plan will have completely paid off their loans, and therefore would have no remaining balance left to be forgiven under PSLF. However, a borrower that was initially in a 10-year Standard repayment plan and later changed to an income-driven repayment plan would be able to count payments made under the Standard plan towards their 120 required monthly payments.

¹⁰ Education recommends that borrowers submit new requests to certify their employment and loans both annually and when they switch employers.

Figure 1: Education's Voluntary Process for Certifying Employment and Loans as Eligible for PSLF



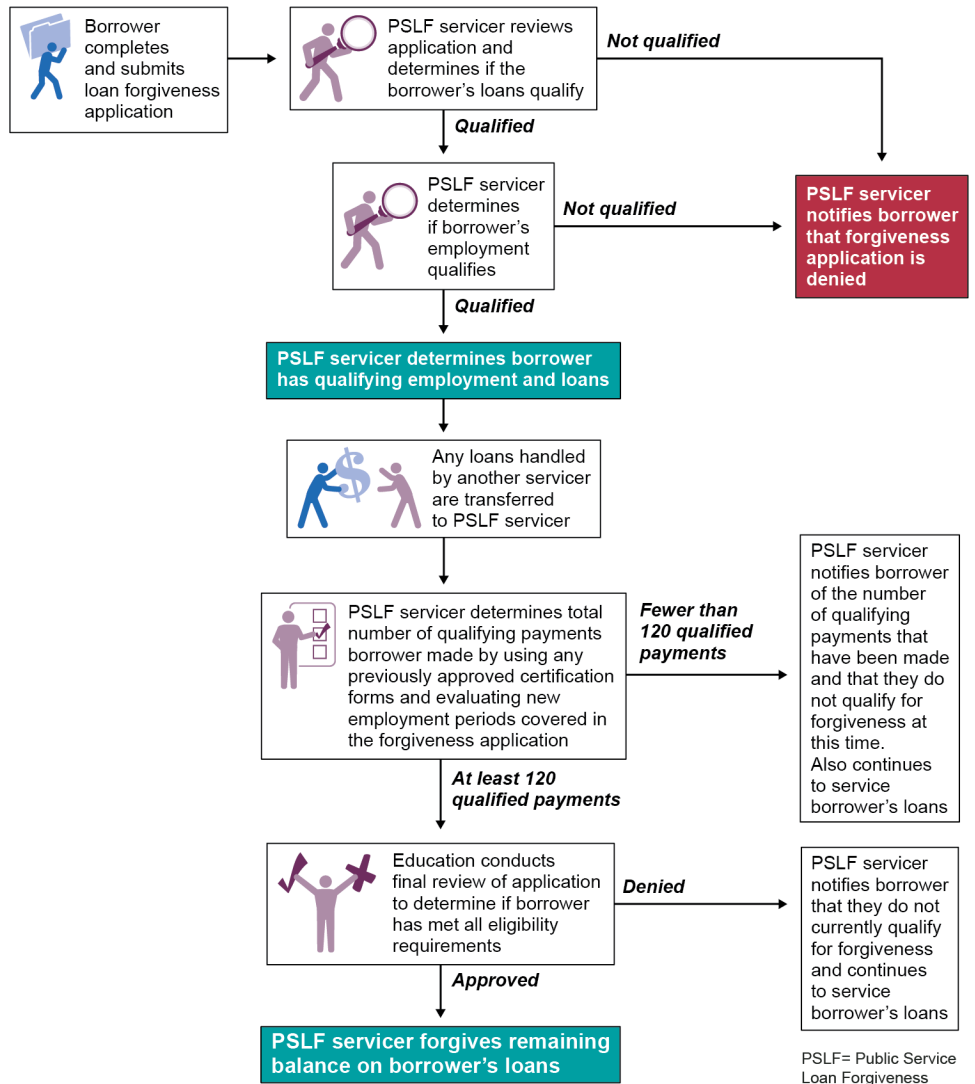
Source: GAO analysis of Department of Education (Education) documents. | GAO-18-547

In September 2017, 10 years after the PSLF program was established, Education began accepting loan forgiveness applications from borrowers. The application is similar to the form borrowers use to request certification of their employment and loans for PSLF, but is intended for borrowers that have already made 120 qualifying payments (see fig. 2). The PSLF servicer reviews a borrower's application and incorporates information from any previously approved certification forms to determine if the borrower's employment and loans qualify and if they have made 120 qualifying payments. If the borrower meets all of these requirements, the

PSLF servicer forwards the application to Education for final review.¹¹ If Education determines the borrower has met all eligibility requirements, it directs the PSLF servicer to forgive the remaining balance on the borrower's loans.

¹¹ Unless a borrower requests otherwise on their application, the PSLF servicer places eligible loans in forbearance while the application is being reviewed by Education. However, if Education determines that the borrower is not eligible for forgiveness, the forbearance ends and any unpaid interest that accrued during this period may be added to the loan principal balance.

Figure 2: PSLF Application Process



Source: GAO analysis of Department of Education (Education) documents. | GAO-18-547

Many Borrowers Are Pursuing Public Service Loan Forgiveness, and Recent Legislation Requires Education to Conduct Additional Outreach to Borrowers

Over 890,000 Borrowers Took an Initial Step Towards Qualifying for PSLF by Having Their Employment and Loans Certified, and 55 Have Received Loan Forgiveness

Over 890,000 borrowers have taken an initial step towards qualifying for the PSLF program by voluntarily having their employment and loans certified as eligible for PSLF, according to data from the PSLF servicer as of April 2018.¹² Of these, over 520,000 borrowers had recorded at least one qualifying payment that counted towards the 120 required to be eligible for loan forgiveness (see fig. 3). In total, almost 1.2 million borrowers requested to have their employment and loans certified but over 280,000 were denied, primarily due to missing information on the form, or because they did not have qualifying federal loans or work for a qualifying employer, according to data from the PSLF servicer.

¹² For the purposes of this report, we consider borrowers to have certified employment and loans when they have submitted at least one approved certification form.

Figure 3: PSLF Certification Requests: Selected Outcomes for Borrowers Who Requested to Have Their Employment and Loans Certified as Eligible for Loan Forgiveness, as of April 2018

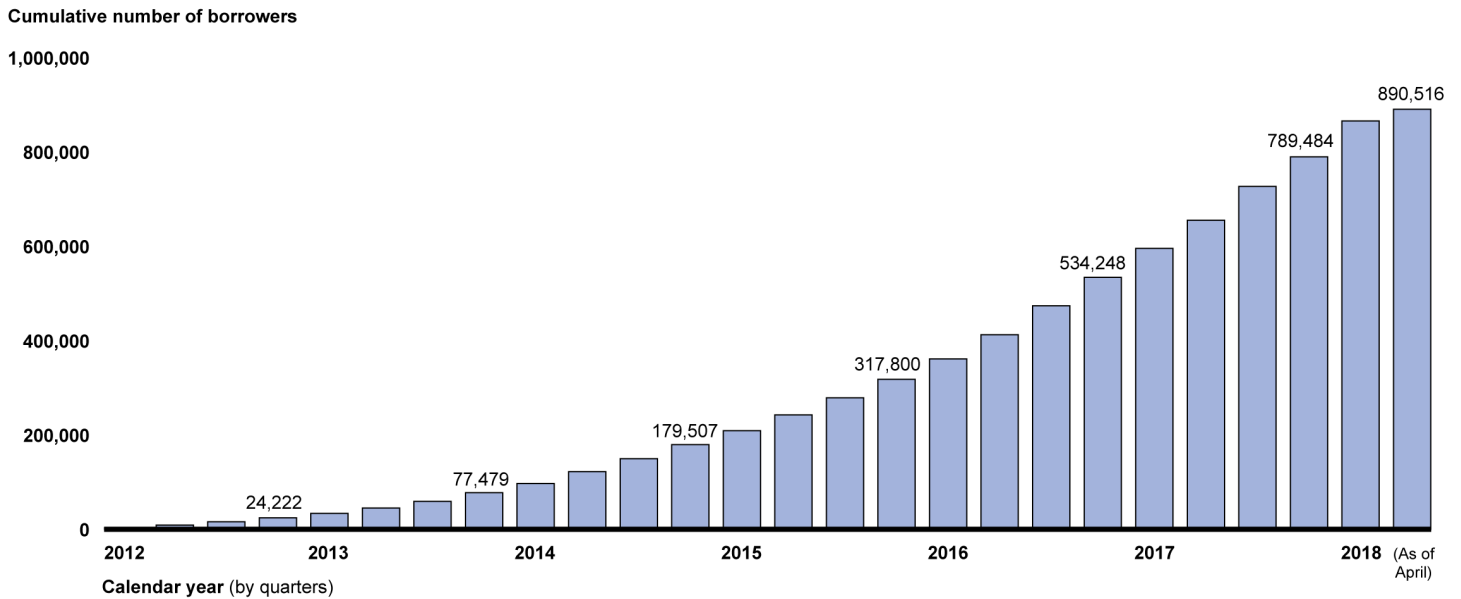


Source: GAO analysis of data from the Public Service Loan Forgiveness (PSLF) servicer. | GAO-18-547

Note: Of borrowers that had their employment and loans certified as eligible for PSLF, 58 percent had recorded at least one qualifying payment.

The number of new borrowers whose employment and loans have been certified as eligible for PSLF has increased in each of the past 6 years, according to PSLF servicer data (see fig. 4). Officials with the PSLF servicer said they anticipated that the volume would continue to increase as the program gains visibility.

Figure 4: Cumulative Number of Borrowers Who Had Their Employment and Loans Certified as Eligible for PSLF, January 2012 to April 2018, by Quarter

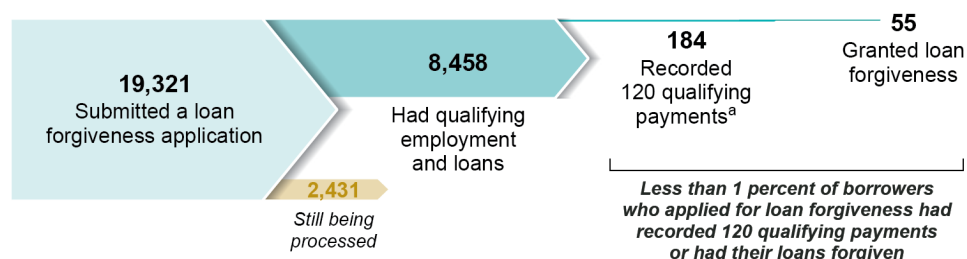


Source: GAO analysis of data from the Public Service Loan Forgiveness (PSLF) servicer. | GAO-18-547

Note: These borrowers voluntarily had their employment and loans certified as eligible for PSLF as an initial step towards applying for loan forgiveness.

In the first 8 months that borrowers were able to apply for loan forgiveness (September 2017 through April 2018), Education had approved 55 borrowers and forgiven a total of almost \$3.2 million in outstanding student loan balances, an average of almost \$58,000 per borrower. The amount of loan forgiveness for individual borrowers ranged from almost \$800 to almost \$290,000. Over 19,300 borrowers had submitted loan forgiveness applications as of April 2018 (see fig. 5). Of the almost 17,000 borrowers with applications that had been processed, over 40 percent had qualifying loans and employment but were denied because they had not yet made 120 qualifying payments. The other most common reasons borrowers were denied included missing information on the application or because the borrower did not have qualifying federal loans. Education officials estimated that about 700 borrowers will be approved for loan forgiveness by September 30, 2018.

Figure 5: Loan Forgiveness Applications: Selected Outcomes for Borrowers Who Applied for Loan Forgiveness, as of April 2018



Source: GAO analysis of data from the Public Service Loan Forgiveness (PSLF) servicer. | GAO-18-547

^aOne hundred twenty-nine of these borrowers were still awaiting final approval from Education as of April 30, 2018. Education had not denied any of the applications recommended for approval by the PSLF servicer, according to PSLF servicer officials.

Borrower Confusion about PSLF Requirements Persists, and Recent Legislation Requires Education to Conduct Additional Outreach

Although Education has conducted some outreach to communicate PSLF program requirements to borrowers, the large number of borrowers whose certification requests and forgiveness applications were denied suggests that many borrowers do not understand or are not aware of these requirements. For example, over half of borrowers that requested to have their employment and loans certified as of April 2018 either did not meet basic eligibility requirements or had yet to make any qualifying loan payments. This includes over 150,000 borrowers who requested to have their employment and loans certified despite not having qualifying federal loans, which suggests these borrowers either did not know which types of

loans they had or which types qualified for the program.¹³ Borrowers who had qualifying loans also may have been confused about requirements related to making qualifying payments. Over 370,000 borrowers that had their employment and loans certified as of April 2018 had not made any qualifying payments at the time of certification because they were not on qualifying repayment plans, had loans in a deferment or forbearance, were still in the grace period before starting repayment, or had recently consolidated their loans, among other reasons, according to PSLF servicer data (see fig. 6).¹⁴ Although some of these borrowers may have understood how prior choices they made regarding repayment of their loans would affect their ability to make qualifying payments, other borrowers may not have.

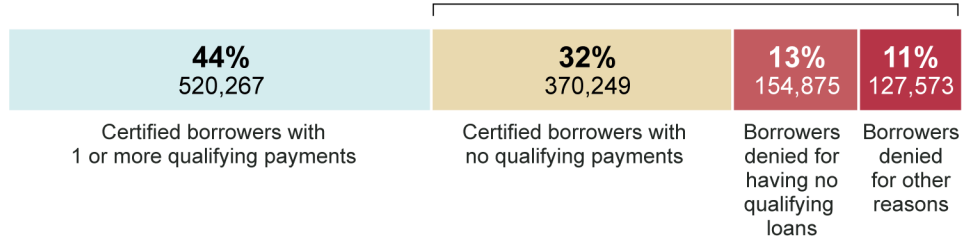
¹³ Similarly, many borrowers submitting forgiveness applications also did not meet certain eligibility requirements, suggesting they may not have understood or were not aware of these requirements. For example, about 20 percent of borrowers who applied for loan forgiveness did not have any qualifying federal loans.

¹⁴ Because the number of borrowers' qualifying payments is calculated based on the information included on their certification request forms, it is possible that some additional borrowers have made payments that will be counted as qualifying payments once they submit new certification forms. Deferment and forbearance allow borrowers to temporarily stop making loan payments or temporarily reduce the payment amount under certain circumstances, but any payments made while in deferment or forbearance status do not count towards PSLF. When borrowers consolidate loans, their qualifying payment count resets to zero, and any prior payments they made no longer qualify towards the required 120 payments. The grace period is a set period of time after borrowers graduate, leave school, or drop below half-time enrollment before they must begin repaying certain federal loans. Payments made during the grace period do not count towards PSLF.

Figure 6: Certification and Denial Outcomes for Borrowers Who Requested to Have Their Employment and Loans Certified as Eligible for Loan Forgiveness, as of April 2018

Of the 1,173,420 borrowers...

56% of borrowers who requested to have their employment and loans certified were denied or had yet to record a qualifying payment



Source: GAO analysis of data from the Public Service Loan Forgiveness (PSLF) servicer. | GAO-18-547

Note: Other reasons for denial include borrowers who submitted incomplete information on the form or did not have qualifying employment, according to PSLF servicer officials.

Officials with the PSLF servicer said borrowers were frequently confused by program requirements related to qualifying loans, employment, repayment plans, and payments. For example, PSLF servicer officials said that borrowers were sometimes unaware that they were not on a qualifying repayment plan or that forbearance, deferment, and loan consolidation would affect their qualifying payments. PSLF servicer frontline customer service staff also said they frequently received calls from borrowers who were confused about whether their loans qualified for PSLF and other program requirements. Two other loan servicers we spoke to identified the same general areas of confusion among borrowers who call with questions about PSLF. In addition, borrower complaints reported by the Consumer Financial Protection Bureau indicate confusion with PSLF requirements related to qualifying loans and payments.¹⁵

Education uses several methods to conduct outreach to inform borrowers about PSLF requirements, but denial data suggest and PSLF servicer officials confirmed that borrower confusion persists. Education currently provides information on its website about PSLF requirements and links to an online portal where borrowers can check what types of loans they have and identify their loan servicer.¹⁶ When the PSLF servicer notifies

¹⁵ Consumer Financial Protection Bureau, *Staying on Track While Giving Back: The Cost of Student Loan Servicing Breakdowns for People Serving Their Communities* (Washington, D.C.: June 2017).

¹⁶ See <https://studentaid.ed.gov/sa/repay-loans/forgiveness-cancellation/public-service>.

borrowers that their certification requests or forgiveness applications were denied, the notification letter includes information on program requirements and explains why the borrower did not qualify for the program. Education has also adopted other methods to raise awareness of the program among borrowers, such as webinars and outreach to schools, in response to a recommendation in our previous report.¹⁷ Education also instructs borrowers who have additional questions about PSLF to contact the PSLF servicer. However, officials with the PSLF servicer said they can provide more details about the program but cannot answer certain eligibility questions, such as whether a particular borrower has qualifying employment or is on a qualifying repayment plan, until the borrower submits a form to request certification.¹⁸ Officials with three other loan servicers we spoke with also said it is their general policy not to answer specific questions about an individual borrower's eligibility for PSLF due to the complexity of program requirements, and they instead direct the borrower to contact the PSLF servicer. Although this approach may help avoid the risk of other servicers providing borrowers with incorrect advice, it highlights the need for Education to provide borrowers with clear and sufficient information about how to qualify for the program. It is essential for borrowers to understand eligibility requirements because the retrospective nature of the program requires borrowers to make decisions about their loans and employment months or years before they submit a PSLF certification request or apply for loan forgiveness. For example, the Consumer Financial Protection Bureau reported that borrowers have complained of spending years making payments, believing they were making progress towards PSLF loan forgiveness, and then learning that they were not eligible.¹⁹

Recent legislation requires Education to conduct additional outreach. The consolidated appropriations act enacted in March 2018 appropriated \$350

¹⁷ GAO, *Federal Student Loans: Education Could Do More to Help Ensure Borrowers Are Aware of Repayment and Forgiveness Options*, [GAO-15-663](#) (Washington, D.C.: August 25, 2015). In addition, Education officials said they developed toolkits for employers and schools and required student loan servicers to provide borrowers with information about PSLF when they expressed interest in the program.

¹⁸ In some cases, this is because another loan servicer is servicing the borrower's loans, and the PSLF servicer cannot access information about the borrower until it processes the certification request form.

¹⁹ Consumer Financial Protection Bureau, *Staying on Track While Giving Back: The Cost of Student Loan Servicing Breakdowns for People Serving Their Communities* (Washington, D.C.: June 2017).

million to forgive the loans of borrowers who otherwise would qualify for PSLF had they not selected a non-qualifying repayment plan.²⁰ In addition to these funds, the act directed that \$2.3 million of Education's appropriation for administering student aid be used to conduct outreach to borrowers about PSLF, to help ensure borrowers are meeting program requirements.²¹ The act specifically requires Education to communicate PSLF program requirements to all Direct Loan borrowers and improve PSLF outreach and information through calls, electronic communications, and other methods. Once implemented, these provisions could reduce confusion about PSLF requirements and help Education provide better service to borrowers.

²⁰ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, § 315, 132 Stat. 348. The funds are available until expended, on a first-come, first-serve basis, to forgive the loans of borrowers who were repaying their Direct Loans through certain non-qualifying repayment plans, such as Graduated or Extended repayment plans, provided they meet certain additional requirements. According to Education, this temporarily expanded opportunity for loan forgiveness is only available to borrowers who previously submitted a PSLF application that was denied solely because some or all payments were not made under a qualifying repayment plan, who have at least 10 years of qualifying employment, and who have made 120 qualifying payments under the requirements for the temporary program.

²¹ Pub. L. No. 115-141, § 316, 132 Stat. 348.

Education Could Provide More Comprehensive Information to Improve Program Administration and Qualifying Employment and Loan Payment Determinations

Education's Piecemeal Guidance and Instructions to the PSLF Loan Servicer Create Challenges for Program Administration

Education does not have a comprehensive document or manual to provide the PSLF servicer guidance and instructions, which PSLF servicer officials said makes it difficult to effectively administer the program and provide consistent service to borrowers. Instead, Education's guidance and instructions to the PSLF servicer are dispersed in a piecemeal manner across multiple documents, including Education's original contract with the servicer, multiple updates to the contract, and hundreds of emails. According to PSLF servicer officials, administering the program based on this fragmented collection of guidance and instructions creates a risk that relevant information may be overlooked.

Education's use of email to communicate key guidance and instructions to the PSLF servicer is particularly problematic because this important information is not disseminated to relevant individuals at Education and the PSLF servicer in the same standard fashion as official changes to the servicing contract. Various individuals at Education have sent emails with guidance and instructions to different staff at the PSLF servicer. As a result, all the relevant parties may not be aware of important policy changes or clarifications provided in these emails, according to PSLF servicer officials and Education's monitoring reports. In one instance, for example, Education staff incorrectly identified what they thought was an error in how the servicer was certifying borrowers that were employed part-time because they were not aware of the most recent guidance that other staff at Education had emailed the servicer on the topic. Similarly, PSLF servicer officials said their staff are sometimes unaware of relevant

guidance and instructions in emails provided by Education, which creates a risk that some policy updates will be overlooked and not consistently implemented. Education has also used email to communicate certain policy clarifications involving employer eligibility and payment counting that, according to the PSLF servicer, have affected hundreds of borrowers and set precedents for future eligibility decisions.

Gaps in Education's guidance and instructions have also left the PSLF servicer uncertain about how to administer key aspects of the program. For example, PSLF servicer officials said that from 2016 to 2018 they were awaiting additional clarifications from Education about how to account for loan payments when borrowers pay more than the amount due or submit a payment several weeks before the due date. How overpayments and prepayments are accounted for can affect whether the borrower's subsequent payments qualify for PSLF because borrowers can only receive credit for one payment per month and only when a payment is due. While Education provided a clarification about how to address this issue in May 2018, current guidance from Education on other topics is still unclear or incomplete, according to PSLF servicer officials.

The absence of a central, authoritative source of PSLF guidance and instructions creates a risk of differing interpretations and inconsistent implementation. The PSLF servicer has developed its own internal processing handbook based on Education's guidance and instructions, which PSLF servicer officials said is useful for helping staff process certifications and forgiveness applications. However, Education has reviewed sections of this processing handbook and identified places where the handbook does not accurately reflect PSLF requirements and could result in borrowers' certification requests being improperly approved or denied. The PSLF servicer has made updates to its processing handbook to address certain issues that Education identified, but Education has not conducted a comprehensive review of this handbook. As a result, there is a risk that the PSLF servicer may still be applying Education's guidance and instructions differently from how the agency intended. PSLF servicer officials said it would be helpful if Education created a centralized manual of PSLF guidance and instructions. The lack of a central guidance document also makes it difficult to maintain program continuity in the event of staff turnover or if Education decides to contract with a new servicer to administer the PSLF program. Federal internal control standards state that agencies should communicate information to those who need it, in a form that enables them to carry out their

responsibilities.²² Education has recently taken some steps to provide clearer guidance and instructions, such as holding meetings with PSLF servicer officials every 2 weeks to discuss any administrative issues. Education officials also told us they plan to develop a comprehensive PSLF servicing manual, but they do not have a timeline for completing it. They are currently drafting an initial section of the manual focusing on payment counting. The current lack of a definitive and comprehensive source of guidance and instructions for the PSLF servicer creates the risk of inconsistent interpretations that could potentially result in borrowers being improperly denied loan forgiveness since Education does not currently review loan forgiveness applications that are denied by the PSLF servicer.

Additional Information from Education Could Improve the PSLF Servicer's and Borrowers' Ability to Determine Whether Borrowers' Employment Qualifies for Loan Forgiveness

Education has provided the PSLF servicer and borrowers with limited information that could help them determine which employers qualify for PSLF, creating uncertainty for borrowers and increasing the risk that the PSLF servicer may improperly certify or deny certification to some borrowers. Education has not provided the PSLF servicer with a definitive source of information for determining which employers qualify a borrower for loan forgiveness. Instead, Education has identified some data sources the PSLF servicer can use to determine whether borrowers are working for qualifying employers. However, these sources are not comprehensive, and PSLF servicer officials said they sometimes have to consult other sources that have significant limitations. For example, Education directs the PSLF servicer to review the Internal Revenue Service's public list of 501(c)(3) organizations to identify qualifying nonprofit employers. Since this list does not capture all potentially qualifying nonprofits, the PSLF servicer supplements this with other sources that have not been fully reviewed or assessed for accuracy by Education. For example, PSLF servicer officials told us they use an online directory of nursing home facilities to help determine if certain nursing homes are nonprofit employers. However, this website explicitly states that it does not guarantee that the information it provides is accurate or current. PSLF servicer officials also said they sometimes use state government websites to research organizations' nonprofit status, but they only have access to the relevant information from states that provide it for free. For assessing government employers, Education directs the servicer to www.usa.gov,

²² GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 10, 2014).

an official federal government website that describes government agencies and services, but this source provides limited information on state and local government employers. In addition, PSLF servicer officials said it is particularly difficult to assess certain types of employers, such as quasi-governmental entities and charter schools. PSLF servicer officials said that when they are uncertain whether an employer qualifies, they elevate the assessment to Education, but they generally try to resolve as many employer determinations as possible by using supplemental sources to research employers.²³ However, the reliability of some of these supplemental sources is unclear.

PSLF servicer officials said that having additional information would help them assess employers more quickly and minimize the risk of inaccurate decisions. One way to provide this information would be for Education to develop an official, comprehensive list of qualifying employers, which would help the PSLF servicer assess employers and help borrowers determine whether they are eligible for PSLF, according to PSLF servicer officials. Education officials said they are considering creating their own list of qualifying employers and are investigating how to leverage information from other federal government agencies that could be useful for categorizing employers. In particular, Education officials said they have reached out to the Internal Revenue Service to explore the feasibility of obtaining relevant data on employers. Education could also expand and improve on a database that the PSLF servicer created based on its prior assessments of employers. Education staff that conducted a spot check on the PSLF servicer's database expressed concerns about using it as a sole source for assessing employers, according to an Education monitoring report, but Education officials said it could provide a foundation for Education to build on.

Borrowers would also benefit from additional information about qualifying employers, according to PSLF servicer officials. Education currently provides borrowers with basic information on the types of employers that qualify for PSLF, but not sufficient details to reliably determine whether specific employers qualify. When borrowers contact their loan servicer with questions about their employer's eligibility, officials with the PSLF servicer and other loan servicers we spoke with said they generally do not provide borrowers with information about whether a specific employer

²³ With the exception of employment decisions the PSLF servicer elevates, Education generally does not assess the PSLF servicer's employment determinations until borrowers are approaching final loan forgiveness, according to Education officials.

qualifies, due to the complexities involved in assessing qualifying employers. Instead, borrowers are encouraged to submit an employment certification form once they are working for an employer in order to find out if the employer qualifies. PSLF servicer officials said that providing borrowers with access to additional information about qualifying employers, such as an official list, would reduce uncertainty for borrowers and reduce the number of borrowers who submit certification requests and forgiveness applications despite working for non-qualifying employers.²⁴ In addition, making this information readily available to borrowers could help them to make better informed employment decisions rather than having to wait to submit a certification request after they have started a job to find out if their employer qualifies.

Federal internal control standards state that agencies should communicate the necessary quality information to those who need it in order to achieve the agencies' objectives.²⁵ Unless Education provides additional information to help the PSLF servicer make employer assessments, it will remain difficult to determine whether employers qualify for the program, raising the risk that borrowers' certification requests will be improperly approved or denied. Moreover, without access to sufficient information about qualifying employers, borrowers will not be able to reliably determine whether certain employers qualify for PSLF. This creates uncertainty for borrowers as to which jobs and careers to pursue and leaves them to make important employment decisions without knowing until after the fact how these decisions affect their future eligibility for PSLF.

²⁴ Out of over 1 million borrowers who submitted PSLF certification requests as of January 2018, almost 84,000 borrowers had at least one request denied for having non-qualifying employment.

²⁵ [GAO-14-704G](#).

Education Could Improve the Information Provided to the PSLF Servicer and Borrowers about Whether Borrowers' Payments Qualify for Loan Forgiveness

Collecting Consistent Payment Information

Education does not ensure the PSLF servicer receives consistent information on borrowers' prior loan payments from other loan servicers, which could raise the risk of qualifying payments being miscounted. In order to process certification requests and loan forgiveness applications, the PSLF servicer has to examine the borrower's prior loan payment information to determine which prior payments count towards the 120 needed to qualify for loan forgiveness. This is relatively easy in cases where the PSLF servicer was servicing the borrower's loans during the entire period he or she was pursuing PSLF because the servicer already has the necessary information on their prior payments, according to PSLF servicer officials. However, the PSLF servicer does not have the same information readily available for loans that are serviced by one of Education's eight other loan servicers. For these loans, Education established a process for servicers to use in transferring loan and prior payment information to the PSLF servicer.²⁶ The servicers transfer most information through standardized templates that Education developed. However, despite the use of standardized templates, the PSLF servicer does not receive consistent and reliable information from other servicers, according to PSLF servicer officials. For example, PSLF servicer officials said the lack of standard definitions and terminology among loan servicers leads servicers to interpret some data fields differently, resulting in inconsistencies in the data other loan servicers report to the PSLF servicer. Comparable data and standardized terminology is particularly important given the need for loan servicers with different systems and practices to communicate key payment information with one another. PSLF servicer officials said inconsistencies in the information provided by

²⁶ PSLF servicer officials said they request the transfer of loans and prior payment information from other servicers after the borrower has submitted a certification request or loan forgiveness application and the PSLF servicer has determined that the borrower's loans and employment qualify as eligible for PSLF.

other loan servicers make it challenging to determine whether borrowers are on qualifying repayment plans or making qualifying payments. For example, when a borrower has multiple loans, PSLF servicer officials said they assess PSLF eligibility and payments separately for each individual loan. Officials added that some servicers only report total monthly payments for the borrower's combined loans, and not how these payments were allocated among each loan. This makes it difficult for the PSLF servicer to determine whether the borrower paid the full monthly payment amount due on each loan, which it needs to know in order to determine whether the payment qualifies for PSLF.

Officials with Education and the PSLF servicer said that inconsistencies in the information obtained from other loan servicers increase the risk of miscounting qualifying payments. Education officials said they have started to track these data consistency problems and coordinate discussions among the PSLF servicer and the three other loan servicers that together provide the data systems used by all nine servicers. However, these efforts are in the early stages. Federal internal control standards state that agencies should use quality information to achieve their objectives.²⁷ Standardizing the prior payment information transferred among servicers could improve the PSLF servicer's ability to determine qualifying payment counts for borrowers transferring from other servicers.

Communicating Information to Borrowers

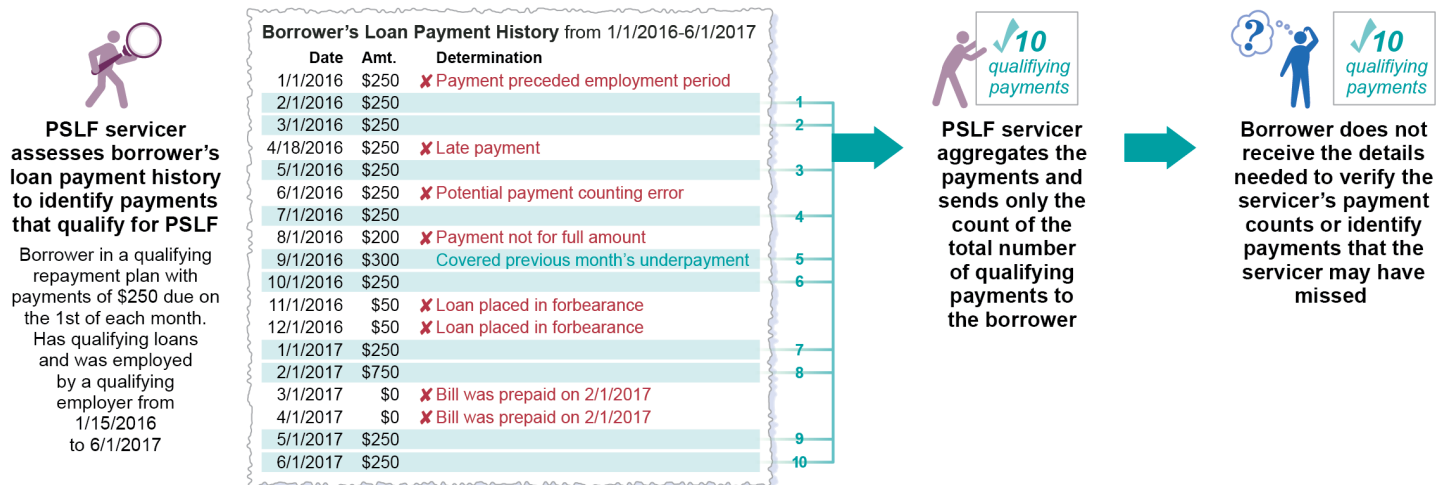
Although Education and PSLF servicer officials acknowledge the risk of miscounting qualifying payments, the PSLF servicer does not provide borrowers with sufficient information to easily catch errors. In addition to the risks caused by inconsistent prior payment information from other loan servicers, the payment counting process is also vulnerable to errors in instances when the PSLF servicer has to manually review payment information from other servicers, according to PSLF servicer officials and an Education monitoring report.²⁸ Borrowers whose loans were transferred to the PSLF servicer from other loan servicers have complained about inaccurate qualifying payment counts, according to a

²⁷ [GAO-14-704G](#).

²⁸ For example, when a borrower's prior loan servicer is no longer servicing Direct Loans, or if the borrower has had more than one prior loan servicer, the borrower's payment history is provided to the PSLF servicer in a series of original loan servicing documents rather than the standard templates. The PSLF servicer has to review these documents to manually identify relevant payment information. In some cases, PSLF servicer officials said they must review dozens, or even hundreds of pages of loan servicing documents, and reconcile conflicting payment information as needed.

Consumer Financial Protection Bureau report.²⁹ Officials with the PSLF servicer said they rely on borrowers to catch any payment counting errors resulting from issues with information provided by other loan servicers. However, the PSLF servicer provides borrowers with aggregate counts of qualifying payments, which are useful for helping borrowers track their progress, but do not provide borrowers with enough detail to check the servicer's counts and identify prior payments that the servicer may have missed (see fig. 7). Borrowers have several options for disputing payment counts or other aspects of the eligibility determination process, including contacting the PSLF servicer or filing an official complaint with Education's Federal Student Aid Ombudsman Group or through the Federal Student Aid Feedback System.³⁰ However, the lack of detailed information on qualifying payment counts makes it difficult for borrowers to determine whether the count is correct or not.

Figure 7: Hypothetical Example of the PSLF Servicer's Payment Counting Process and Information Shared with Borrowers



Source: GAO analysis of documents from the Department of Education and the Public Service Loan Forgiveness (PSLF) Servicer. | GAO-18-547

²⁹ Consumer Financial Protection Bureau, *Staying on Track While Giving Back: The Cost of Student Loan Servicing Breakdowns for People Serving Their Communities* (Washington, D.C.: June 2017).

³⁰ Education's Federal Student Aid Ombudsman Group is dedicated to helping resolve disputes related to the federal student aid programs. Education's Federal Student Aid Feedback System is an online portal that allows federal student aid customers to submit complaints, provide positive feedback, and report allegations of suspicious activity regarding their experience with federal student aid programs.

Education officials said they have not considered requiring the PSLF servicer to provide more detailed information to borrowers on which prior payments were approved or denied. Officials noted that there would be a cost associated with providing this information to borrowers, although they have not produced a cost estimate. Also, officials said that providing too much information may confuse borrowers, and they must consider how to meet borrowers' need for detailed information without overwhelming borrowers with payment counting complexities. Officials with the PSLF servicer said providing this information to borrowers could be helpful but would require time to confirm the information was correct and would only be done at the direction of Education. Federal internal control standards state that agencies should communicate necessary quality information to external parties.³¹ While providing too much information could prove counterproductive, borrowers could benefit from receiving greater detail about their qualifying payments beyond the aggregate counts of qualifying payments that they currently receive. Without clearer and more detailed information on qualifying payments, borrowers may not detect any errors in payment counts, which could ultimately affect borrowers' eligibility for loan forgiveness.

Conclusions

Education is responsible for establishing the administrative structure necessary to fulfill the PSLF program's goal of encouraging individuals to enter and continue in public service employment by providing loan forgiveness to eligible borrowers who meet program requirements. However, Education has not provided the PSLF servicer with a comprehensive source of guidance and instructions on how to operate the program, raising the risk that the PSLF servicer may improperly approve or deny borrowers' certification requests and forgiveness applications. Education officials told us they have plans for creating a comprehensive PSLF servicing manual, but no timeline for doing so.

Working for a qualifying employer is one of the key requirements of the PSLF program; however, Education has not provided the PSLF servicer and borrowers with sufficient information for determining whether employers qualify. This makes the PSLF servicer's employer assessments vulnerable to inconsistencies and fosters uncertainty for borrowers as to whether or not their employment will eventually qualify them for loan forgiveness.

³¹ [GAO-14-704G](#).

Similarly, inconsistencies in the information used for counting borrowers' qualifying loan payments raise the risk of errors. Borrowers should be confident that their loan payments will be accurately counted regardless of who their servicer is. However, Education has not ensured the PSLF servicer is receiving consistent loan payment history information from other loan servicers, increasing the risk of inaccurate qualifying payment counts. The chance that these and any other payment counting errors will go undetected is compounded by the fact that Education does not require the PSLF servicer to provide borrowers with details on which payments qualified and which did not. This makes it difficult for borrowers to detect erroneous counts that could ultimately affect their eligibility for loan forgiveness. Consequently, some borrowers may be required to make more payments than necessary before receiving loan forgiveness, while others may be improperly approved for forgiveness.

Recommendations for Executive Action

We are making the following four recommendations to Education's Office of Federal Student Aid:

The Chief Operating Officer of the Office of Federal Student Aid should develop a timeline for issuing a comprehensive guidance and instructions document for PSLF servicing. This could involve developing a new servicing manual or expanding upon the PSLF servicer's existing processing handbook. (Recommendation 1)

The Chief Operating Officer of the Office of Federal Student Aid should provide additional information to the PSLF servicer and borrowers to enhance their ability to determine which employers qualify for PSLF. This could involve Education developing an authoritative list of qualifying employers or improving the PSLF servicer's existing database, and making this information available to borrowers. (Recommendation 2)

The Chief Operating Officer of the Office of Federal Student Aid should standardize the information the PSLF servicer receives from other loan servicers to ensure the PSLF servicer obtains more consistent and accurate payment information for borrowers pursuing PSLF. (Recommendation 3)

The Chief Operating Officer of the Office of Federal Student Aid should ensure that borrowers receive sufficiently detailed information from the PSLF servicer to be able to identify any errors in the servicer's counts of qualifying payments, including information on whether or not each payment qualified toward forgiveness. (Recommendation 4)

Agency Comments and Our Evaluation

We provided a draft of this report to Education for its review and comment. In its comments, reproduced in appendix I, Education concurred with each of our recommendations and identified steps it plans to take to implement them. To improve guidance and instructions for PSLF servicing, Education stated it is documenting PSLF requirements and guidelines and plans to incorporate them into a comprehensive guide. Regarding our recommendation to provide additional information on qualifying employers to the PSLF servicer and borrowers, Education stated that it is reviewing options for developing an online help tool that would be expanded to incorporate qualifying employer information. To standardize the information other loan servicers provide to the PSLF servicer, Education stated it will continue its efforts to address data definition issues related to the data exchanged between servicers. To ensure borrowers receive sufficiently detailed information on counts of qualifying payments, Education stated it will review the letters the PSLF servicer sends to borrowers to determine how to better communicate regarding qualifying payment counts, program requirements, and employer eligibility. We also provided relevant report sections to the PSLF servicer and the three other loan servicers included in our review for technical comments. The PSLF servicer provided technical comments, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0534 or emreyarrasm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

Melissa Emrey-Arras

Melissa Emrey-Arras, Director
Education, Workforce, and Income Security

Appendix I: Comments from the U.S. Department of Education



August 10, 2018

Ms. Melissa Emrey-Arras
Director, Education, Workforce,
and Income Security Issues
United States Government Accountability Office
Washington, D.C. 20548

Dear Ms. Emrey-Arras:

I am pleased to write on behalf of the U.S. Department of Education (Department) in response to the statements and recommendations made in the Government Accountability Office (GAO) draft report, "*Public Service Loan Forgiveness (PSLF): Education Needs to Provide Better Information for the Loan Servicer and Borrowers*" (GAO-18-547).

We appreciate the opportunity to respond to this GAO draft report. The Department agrees that student borrowers and those entities that work to administer their loans require as much information as possible to understand and administer current program requirements. Our response to each of the four recommendations in the GAO draft report is set forth below.

Recommendation 1: The Chief Operating Officer of the Office of Federal Student Aid should develop a timeline for issuing a comprehensive guidance and instructions document for PSLF servicing. This could involve developing a new servicing manual or expanding upon the PSLF servicer's existing processing handbook.

Response: FSA concurs with the recommendation for development of a comprehensive guidance document for PSLF servicing. We continue to focus on the development of processes and procedures to streamline and improve the overall PSLF servicing. In conjunction with these efforts, FSA is documenting requirements and guidelines that will be incorporated into a comprehensive guide.

Recommendation 2: The Chief Operating Officer of the Office of Federal Student Aid should provide additional information to the PSLF servicer and borrowers to enhance their ability to determine which employers qualify for PSLF. This could involve Education developing an authoritative list of qualifying employers or improving the PSLF servicer's existing database, and making this information available to borrowers.

Response: FSA concurs with the recommendation to provide additional information to the PSLF servicer and borrowers to enhance their ability to determine which employers qualify for PSLF, and we are examining ways to best implement a solution. As identified in the report, there are numerous complexities to establishing and maintaining a comprehensive database of qualifying employers, including the need for multiple data sources for such information, changes

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830 First St. N.E., Washington, DC 20202

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in an employer's tax status and timing differences, etc. However, FSA is reviewing options for improvements to the PSLF Employment Certification and Application process, including development of an online help tool, which would be expanded to incorporate qualifying employer information.

Recommendation 3: The Chief Operating Officer of the Office of Federal Student Aid should standardize the information the PSLF servicer receives from other loan servicers to ensure the PSLF servicer obtains more consistent and accurate information for borrowers pursuing PSLF.

Response: FSA concurs with the recommendation to standardize loan transfer information for the PSLF servicer. Efforts are underway to address the data definition issues related to correcting the data exchanged between servicers.

Recommendation 4: The Chief Operating Officer of the Office of Federal Student Aid should ensure that borrowers receive sufficiently detailed information from the PSLF servicer to be able to identify any errors in the servicer's counts of qualifying payments, including information on whether or not each payment qualified toward forgiveness.

Response: FSA concurs with the recommendation to ensure borrowers are receiving sufficiently detailed but simplified information to allow borrowers to better understand and, if appropriate, contest the Department's determination of the number of qualifying payments they have made. Current efforts to review PSLF processes to improve overall servicing and reduce borrower confusion will also include a review of the PSLF letters to determine how to better communicate to borrowers regarding qualifying payment counts, overall program requirements, and employer eligibility.

I appreciate your highlighting the importance of the Department's role in implementing requirements associated with public loan service forgiveness.

Sincerely,



James F. Manning
Acting Chief Operating Officer

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Melissa Emrey-Arras, (617) 788-0534 or emreyarrasm@gao.gov

Staff Acknowledgments

In addition to the contact named above, Debra Prescott (Assistant Director), William Colvin (Analyst-in-Charge), and Linda Collins made key contributions to this report. Additional assistance was provided by James Bennett, Deborah Bland, Alicia Cackley, Sarah Cornetto, Hedieh Fusfield, Kirsten Lauber, Sheila R. McCoy, Jeffrey G. Miller, Jessica Orr, Ellen Phelps Ranen, and Paul Wright.

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