



April 2021

# PUBLIC SERVICE LOAN FORGIVENESS

## DOD and Its Personnel Could Benefit from Additional Program Information



A Century of Non-Partisan Fact-Based Work

# GAO@100 Highlights

Highlights of [GAO-21-65](#), a report to congressional committees

## Why GAO Did This Study

At a time when student loan debt continues to mount for many, the PSLF program—established in 2007 and administered by Education—is intended to encourage individuals to pursue careers in public service.

Senate Report 116-48 included a provision for GAO to study the effectiveness of the PSLF program at promoting military and civilian recruitment and retention as well as military readiness. GAO's report assesses the extent to which (1) DOD personnel pursue and receive loan forgiveness through the PSLF program, (2) Education has shared information with DOD officials and its military and civilian personnel about the program, and (3) DOD uses the program for recruitment and retention to promote readiness.

GAO analyzed student loan data from Education and the PSLF servicer from the beginning of the program through January 2020; reviewed relevant laws, documents, and other information related to PSLF, benefits, recruitment, retention, and readiness; and interviewed DOD and Education officials.

## What GAO Recommends

GAO is making five recommendations to increase information sharing about the PSLF program. These include that DOD provide information to its personnel and issue guidance to its officials about the program, and that Education and DOD collaborate to share information about the program. Education concurred and DOD partially concurred with the recommendations, which GAO continues to believe are valid, as discussed in the report.

View [GAO-21-65](#). For more information, contact Tina Won Sherman at (202) 512-8416 or [ShermanT@gao.gov](mailto:ShermanT@gao.gov) or Melissa Emrey-Arras at (617) 788-0534 or [EmreyArrasM@gao.gov](mailto:EmreyArrasM@gao.gov).

April 2021

## PUBLIC SERVICE LOAN FORGIVENESS

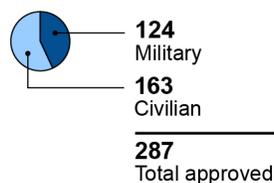
### DOD and Its Personnel Could Benefit from Additional Program Information

## What GAO Found

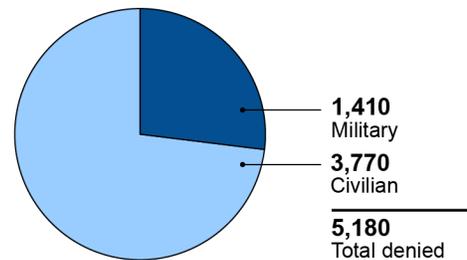
Personnel in the Department of Defense (DOD)—including service members and civilian employees—may be eligible for federal student loan forgiveness through the Public Service Loan Forgiveness (PSLF) program if they remain in public service employment for 10 years while making 120 qualifying loan payments, among other requirements. As of January 2020, Department of Education (Education) data show that 287 DOD borrowers received loan forgiveness, while 5,180 DOD borrowers (about 94 percent) were denied (see figure). The most common reasons for the denials were not enough qualifying payments and missing information on the form. GAO previously reported in September 2019 an overall denial rate of 99 percent for all PSLF applications submitted by borrowers. More information from DOD could help potential applicants be aware of all eligibility requirements.

**Number of Department of Defense (DOD) Personnel Approved or Denied for Public Service Loan Forgiveness (PSLF), as of January 31, 2020**

Number of DOD borrowers approved for forgiveness:



Number of DOD borrowers with a denied PSLF application:



Source: GAO analysis of Department of Education data. | [GAO-21-65](#)

Note: The "Civilian" categories include all civilian employees within DOD, including the military services.

As its administrator, Education has specialized knowledge about the PSLF program but has not shared complete information with DOD. Education officials have not shared with DOD summary information about its personnel who have taken steps to pursue PSLF or service members who may be eligible. Education officials also stated they have not shared the benefits of using the PSLF program together with DOD's student loan repayment program. Education officials have also not updated the student loan guide for service members with specific information on PSLF. Education could take additional steps to improve information sharing about PSLF with DOD personnel. DOD officials expressed interest in obtaining more program information. Collaboration among the departments and updated program information could help DOD officials and its personnel to take full advantage of PSLF.

DOD does not widely use the PSLF program for recruitment and retention to promote readiness despite facing challenges in certain specialty career fields. Some DOD officials we interviewed stated that they preferred to use other DOD benefits and incentives that DOD directly controls, such as bonuses or DOD's student loan repayment program. DOD could enhance its recruitment and retention efforts to promote readiness with department-wide and service-specific guidance about how the PSLF program could be used as a tool for such efforts.

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## Abbreviations

Direct Loan	William D. Ford Federal Direct Loan
DOD	Department of Defense
Education	Department of Education
EIN	Employer Identification Number
FSA	Office of Federal Student Aid
FY	Fiscal Year
NDAA	National Defense Authorization Act
PSLF	Public Student Loan Forgiveness
TEPSLF	Temporary Expanded Public Student Loan Forgiveness

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April 22, 2021

The Honorable Jack Reed  
Chairman  
The Honorable James M. Inhofe  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Adam Smith  
Chairman  
The Honorable Mike Rogers  
Ranking Member  
Committee on Armed Services  
House of Representatives

While the Department of Defense (DOD) is the nation's largest employer with almost 3 million personnel, including military service members and civilian employees, the department has faced recruiting challenges in recent years, particularly for mission-critical career fields such as medicine and information technology.<sup>1</sup> At the same time, student loan debt continues to mount for many individuals in the United States. DOD's efforts to recruit and retain personnel include providing education benefits to eligible personnel, such as the repayment of student loans. According to the Office of Personnel Management's 2018 student loan repayment report to Congress, DOD is the largest federal provider of student loan repayments, distributing more than \$22 million in student loan repayments for 2,775 personnel in calendar year 2018.<sup>2</sup>

The Public Service Loan Forgiveness (PSLF) program, established in 2007, is a federal program intended to encourage individuals to enter and continue in public service employment. As such, it can be an additional recruiting and retention tool for employers like DOD. The Department of Education (Education) administers the PSLF program and provides

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<sup>1</sup>We use "DOD personnel" in this report to refer to DOD service members and civilian employees collectively. According to DOD, as of July 2020, the department employs 2.15 million service members and over 730,000 civilian employees.

<sup>2</sup>Office of Personnel Management, *Federal Student Loan Repayment Program*, Calendar Year 2018 (November 2019).

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forgiveness to borrowers with loans issued through the William D. Ford Federal Direct Loan (Direct Loan) Program who have made at least 10 years of loan payments while working in qualifying public service jobs and meeting other requirements.<sup>3</sup> In 2018, a temporary expanded process for the program was established, and Education reported that, as of January 2020, over \$155 million in loan debt has been forgiven through the PSLF program and its temporary expanded process since 2017 when Education began accepting forgiveness applications.<sup>4</sup> The Senate Committee on Armed Services has noted the importance of the PSLF program in encouraging more Americans to pursue careers serving their communities in critical jobs—including careers in military and civilian service at DOD.<sup>5</sup>

Senate Report 116-48, accompanying a bill for the National Defense Authorization Act for Fiscal Year 2020, includes a provision for us to study the effect of the PSLF program on military and civilian recruitment and retention, and the effectiveness of the PSLF program at promoting military readiness.<sup>6</sup> In our report, we assess the extent to which (1) DOD personnel pursue and receive loan forgiveness through the PSLF program, (2) Education has shared information with DOD officials and its military and civilian personnel about the PSLF program, and (3) DOD uses the PSLF program for recruitment and retention to promote readiness.

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<sup>3</sup>The William D. Ford Federal Direct Loan program is Education's federal student loan program. Under this program, Education is the lender. Education issues and oversees the loans and contracts with companies referred to as "servicers" to process and manage the loans. In addition to military service members and civilian employees, DOD's workforce includes contractor personnel. However, DOD generally does not directly employ contractor personnel. Depending on their employer, these contractor personnel may or may not be considered public service employees for the purposes of the PSLF program.

<sup>4</sup>After concerns were raised about high denial rates for the PSLF program and some borrowers facing barriers to pursuing the program, Congress appropriated \$700 million in 2018 to temporarily expand the PSLF program to forgive the loans of certain borrowers who did not initially qualify. Pub. L. No. 115-141, § 315(2018); Pub. L. No. 115-245, § 313 (2018).

<sup>5</sup>S. Rep. No. 116-48, at 181 (2019).

<sup>6</sup>*Id.*

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To address our first objective, we analyzed data from Education on the number of DOD personnel who have submitted applications for PSLF and the temporary expanded process, or requested to have their employment and loans certified as eligible for PSLF, an optional step that employees can use to track their eligibility and progress in the program.<sup>7</sup> The data we analyzed cover all submitted applications and certification requests from DOD personnel at the start of the program in 2007 through January 31, 2020, the most recent data available at the time of our review. We determined that the data were reliable for our purpose of reporting the extent to which DOD personnel pursue and receive loan forgiveness through the PSLF program by reviewing related documentation, interviewing agency officials, comparing data sets, and reviewing the code used to generate the data. We also examined laws, regulations, and documents related to the PSLF program.

We assessed this evidence against our prior work on management strategies that federal agencies can use to manage the workforce effectively, including to increase employee awareness of benefits and incentives.<sup>8</sup> We also interviewed officials from the Office of the Under Secretary of Defense for Personnel and Readiness (the office responsible for policy and planning related to the education, training, and compensation of DOD personnel), the military services, the National Guard Bureau, and other DOD components regarding their awareness of the PSLF program and the extent to which information about the program is conveyed to personnel.

To address our second objective, we reviewed laws, regulations, and documents related to Education's administration of the PSLF program as well as documents related to DOD's student loan repayment program. We interviewed Education and DOD officials about efforts to make available and share information on the PSLF program with DOD personnel. We also interviewed officials from the Office of Personnel Management and the Consumer Financial Protection Bureau about how they have shared

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<sup>7</sup>The data we analyzed originated from Education's Office of Federal Student Aid and The Pennsylvania Higher Education Assistance Agency's FedLoan Servicing unit, the latter of which we refer to in this report as the PSLF loan servicer.

<sup>8</sup>GAO, *Federal Workforce: Key Talent Management Strategies for Agencies to Better Meet Their Missions*, [GAO-19-181](#) (Washington, D.C.: Mar. 28, 2019).

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information about PSLF with DOD and other federal agencies.<sup>9</sup> We assessed this collected evidence against our prior work on leading practices of high-performing organizations, DOD guidance, and the most recent strategic plan from Education’s Office of Federal Student Aid, the office that administers the PSLF program.<sup>10</sup> We also assessed this collected evidence against the *Standards for Internal Control in the Federal Government*, specifically determining that the standards on communicating the necessary quality information to achieve objectives were relevant to this review.<sup>11</sup>

To address our third objective, we first collected and analyzed DOD informational materials on websites used for recruitment, retention, and readiness for DOD components and specialty career fields. We also reviewed our prior work on DOD recruitment and retention, including work related to critical skills, to provide insight into DOD’s recruitment and retention needs.<sup>12</sup> We interviewed officials from the Office of the Under Secretary of Defense for Personnel and Readiness regarding the use of the PSLF program for recruitment and retention to promote readiness. We also interviewed officials from the military services, civilian offices, the

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<sup>9</sup>The Office of Personnel Management serves as the chief human resources agency and personnel policy manager for the federal government. The Consumer Financial Protection Bureau regulates the offering and provision of consumer financial products or services under the federal consumer financial laws and educates and empowers consumers to make better informed financial decisions.

<sup>10</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). Department of Education, Office of Federal Student Aid, *Strategic Plan FY 2015-19* (Washington, D.C.: November 2015). At the time of our review, this was the most recent strategic plan available from the office. Education has since released its strategic plan for fiscal years 2020-24, which includes similar goals to the ones that we used to evaluate the department’s efforts. Department of Defense Instruction 1304.36, *Education Loan Repayment Program* (Sept. 12, 2018). Department of Defense Instruction 1400.25, vol. 537, *DOD Civilian Personnel Management System: Student Loan Repayment* (May 7, 2020).

<sup>11</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>12</sup>GAO, *Defense Health Care: DOD Should Collect and Use Key Information to Make Decisions about Incentives for Physicians and Dentists*, [GAO-20-165](#) (Washington, D.C.: Jan. 15, 2020); *Human Capital: Improving Federal Recruiting and Hiring Efforts*, [GAO-19-696T](#) (Washington, D.C.: July 30, 2019); and *DOD Personnel: Further Actions Needed to Strengthen Oversight and Coordination of Defense Laboratories’ Hiring Efforts*, [GAO-18-417](#) (Washington, D.C.: May 30, 2018).

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National Guard Bureau, and other DOD components—including a selection of offices in specific career fields—regarding the use of the PSLF program to recruit and retain personnel. We identified the selection of offices in specialty career fields through interviews, DOD materials such as DOD recruitment webpages, and information on the usage of DOD’s student loan repayment program.<sup>13</sup> Finally, we assessed this evidence against DOD’s current civilian human capital operating plan and national defense business operations plan.<sup>14</sup> See appendix I for additional information on our objectives, scope, and methodology.

We conducted this performance audit from October 2019 to April 2021 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.

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## Background

### PSLF Eligibility Requirements and Application Process

The PSLF program provides eligible loan recipients (“borrowers”) with forgiveness on the remaining balance of their Direct Loans after they have met program requirements. To receive forgiveness for a loan, borrowers are required to be employed full-time by a qualifying employer 1) while making 120 on-time monthly payments under an eligible repayment plan, 2) at the time they apply for forgiveness, and 3) at the time they receive forgiveness for their loans.<sup>15</sup> (See figure 1.)

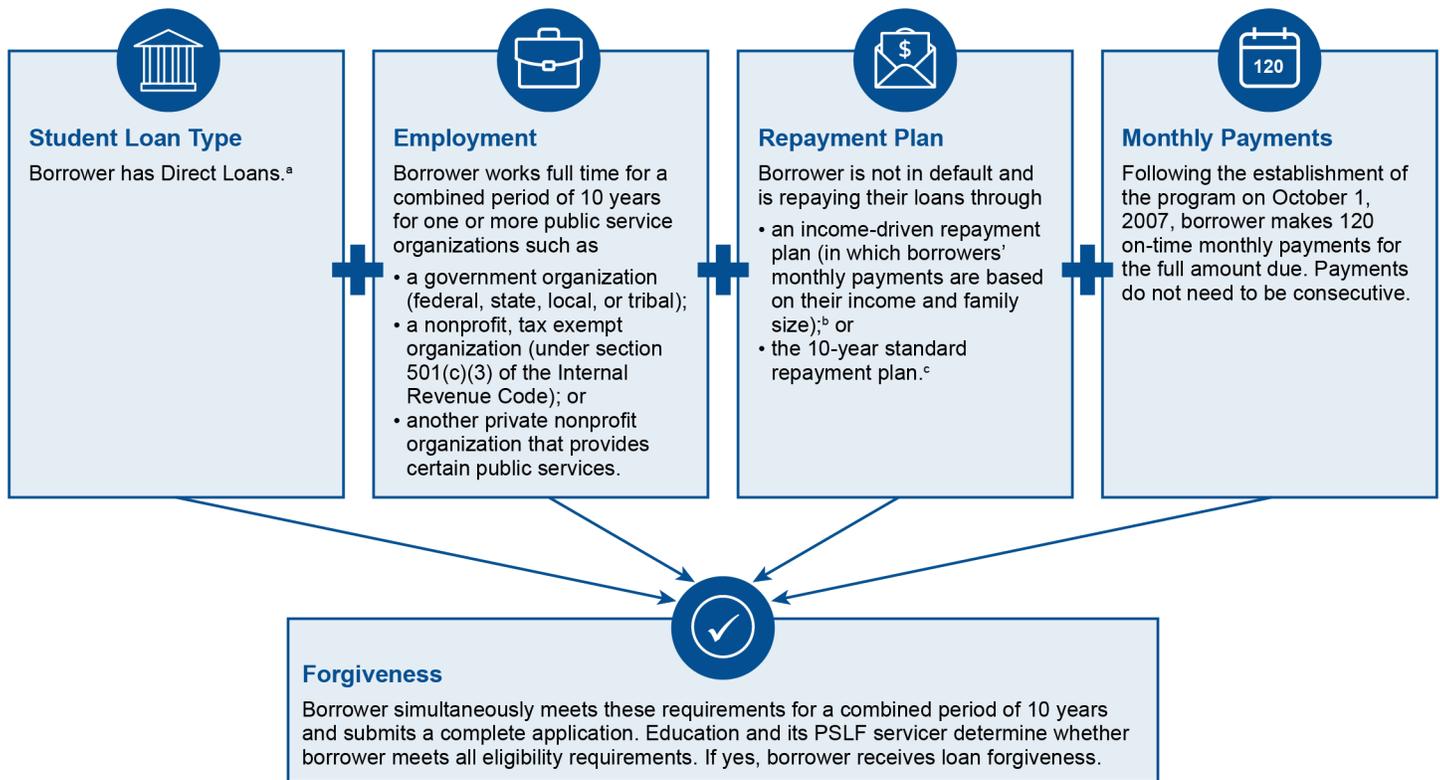
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<sup>13</sup>The specialty career fields included engineers, nurses, contracting and acquisition professionals, judge advocates, information technology specialists, chaplains, musicians, and finance professionals. Information we received include DOD materials such as DOD recruitment webpages and information on the usage of DOD’s student loan repayment program. See appendix I for more details.

<sup>14</sup> Department of Defense, *FY 2020 - FY 2021 Department Of Defense Civilian Human Capital Operating Plan* (Washington, D.C.: October 2019); and *FY 2018 – FY 2022 National Defense Business Operations Appendices* (Washington, D.C.: May 2018).

<sup>15</sup>See 34 C.F.R. § 685.219 for the regulations governing the PSLF program.

**Figure 1: Public Service Loan Forgiveness (PSLF) Program Eligibility Requirements**



Source: GAO analysis of Department of Education documents. | GAO-21-65

<sup>a</sup>Only Direct Loans, including Direct Subsidized Loans, Direct Unsubsidized Loans, Direct Graduate PLUS Loans, and Direct Consolidation Loans are eligible for PSLF. Direct PLUS Loans are loans made to graduate or professional students and parents of dependent undergraduate students and include both Direct Graduate PLUS loans and Parent PLUS loans. Parent PLUS Loans are also eligible for forgiveness but cannot be repaid under any of the income-driven repayment plans unless they are consolidated into a new Direct Consolidation Loan. Borrowers may also consolidate certain federal loans that are not eligible for forgiveness under the PSLF program (e.g., loans under the Federal Family Education Loan program and Perkins Loans) into a single Direct Consolidation Loan to qualify for forgiveness under the PSLF program, but only post-consolidation payments count towards the monthly payment requirements for PSLF.

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

<sup>c</sup>The Standard Repayment Plan has fixed payment amounts ensuring the loan is paid off within 10 years. A borrower on another repayment plan can also generally qualify if the monthly payment amounts equal or exceed the amount the borrower would have paid under the Standard Repayment Plan.

In January 2012, Education began offering an optional process to certify any borrower's public service employment and loans as eligible for the PSLF program. Borrowers can request to have their employment and

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loans certified at any time to make sure they are meeting basic program requirements and are on track towards qualifying for loan forgiveness. Once a borrower submits a request, the PSLF servicer reviews the borrower's employment and loans to determine if both qualify, and if so, counts how many qualifying payments the borrower has made.

In September 2017, when the first borrowers would have become eligible to meet the 10-year public service requirement of the PSLF program, Education began accepting loan forgiveness applications. If Education determines the applicant has met all eligibility requirements, it directs the PSLF servicer to forgive the remaining balance on the applicant's loans. After concerns were raised about high PSLF denial rates and some borrowers facing barriers to pursuing loan forgiveness through the PSLF program, Congress appropriated \$700 million in 2018 to temporarily expand the PSLF program and forgive the loans of certain borrowers who did not initially qualify.<sup>16</sup> Forgiveness through this temporary expanded option is for borrowers who would have been eligible for the PSLF program, but were not repaying their loans in a type of repayment plan that was eligible for the program.<sup>17</sup> (See figure 2.)

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<sup>16</sup>Pub. L. No. 115-141, § 315; Pub. L. No. 115-245, § 313.

<sup>17</sup>The temporary expanded option allows borrowers to qualify for loan forgiveness if they are participating in several additional types of repayment plans, including the Graduated Repayment plan, Extended Repayment plan, Consolidated Standard Repayment plan, and Consolidated Graduated Repayment plan. In addition, for the temporary expanded option, the following two payments generally must be at least as much as the borrower would have paid under an income-driven repayment plan: (1) the payment made immediately prior to applying for the temporary expanded option, and (2) the payment made 12 months prior.

**Figure 2: Public Service Loan Forgiveness (PSLF) Program Key Steps**

	<b>Certification request</b>	<b>Forgiveness application</b>	<b>Temporary expanded option</b>
<b>Purpose</b>	Optional step to help borrowers determine whether they are meeting basic requirements and are on track for forgiveness.	Application for loan forgiveness that is intended for borrowers who have already made 120 qualifying payments.	Additional loan forgiveness option for borrowers who did not initially qualify for the PSLF program because they were repaying their loans in a plan that was ineligible for the PSLF program.
<b>Process</b>	<p>Public Service Loan Forgiveness (PSLF) servicer reviews a borrower’s form and determines whether the borrower’s loans and employment qualify.</p> <p>If yes, the servicer “certifies” the borrower’s employment and loans, counts the borrower’s qualifying payments, notifies the borrower of that number, and continues to service the loans.</p>	<p>PSLF servicer reviews a borrower’s application and determines whether the borrower’s loans and employment qualify, and whether the borrower has made at least 120 qualifying payments.</p> <p>If yes, Education conducts a final review of the application before forgiving the remaining balance on borrower’s loans.</p>	<p>PSLF servicer reviews a borrower’s application and determines whether the borrower’s loans and employment qualify and whether the borrower has made at least 120 payments that qualify under the modified eligibility requirements.<sup>a</sup></p> <p>If yes, Education conducts a final review of the request before forgiving the remaining balance on borrower’s loans.</p>

Source: GAO analysis of Department of Education (Education) documents. | GAO-21-65

<sup>a</sup>The Department of Education (Education) requires that borrowers submit a PSLF application (and be denied) before they can be considered for the temporary expanded option. In November 2020, Education released a new combined PSLF form that serves as the application for certification requests, loan forgiveness, and the temporary expanded option.

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## GAO's Prior Work on the PSLF Program

We testified in September 2019 that about 99 percent of all borrower applications for loan forgiveness had been denied.<sup>18</sup> In 2018 and 2019, we made recommendations to improve information available about the program.<sup>19</sup> Education agreed with our recommendations and has begun to take steps to address them. For example, in 2019, we recommended that Education integrate the request for the temporary expanded option into the PSLF application. In response to this recommendation, in November 2020, Education merged the PSLF application and the request for the temporary expanded process into one consolidated form for borrowers to complete. One of our eight recommendations to Education has not yet been fully implemented. Appendix II provides information on the status of all eight GAO recommendations to Education.

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## Education and DOD Roles and Responsibilities

Education's Office of Federal Student Aid (FSA) administers federal student aid programs, including the Direct Loan program. Under the Direct Loan program, Education issues and oversees the loans while companies referred to as "servicers" are contracted to process and manage them. In 2011, Education contracted with one of its existing loan servicers to be the exclusive servicer for borrowers pursuing PSLF.<sup>20</sup> The PSLF servicer is responsible for processing certification requests and forgiveness applications as well as servicing the loans of borrowers who are pursuing PSLF.

DOD's Office of the Under Secretary of Defense for Personnel and Readiness advises the Secretary of Defense on total force management, readiness and training, military and civilian personnel requirements, and

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<sup>18</sup>This percentage is based on data as of March 2019 for PSLF applications and as of May 2019 for requests through the temporary expanded process. GAO, *Public Service Loan Forgiveness: Opportunities for Education to Improve Both the Program and Its Temporary Expanded Process*, [GAO-19-717T](#) (Washington, D.C.: Sept. 19, 2019). Education reported it had processed 158,263 PSLF applications as of January 2020. Of the processed applications, 155,719 were deemed ineligible. The most common reasons for ineligibility, according to Education data, were insufficient qualifying payments, missing information, and ineligible loans.

<sup>19</sup>GAO, *Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers*, [GAO-18-547](#) (Washington, D.C.: Sept. 5, 2018); and *Public Service Loan Forgiveness: Improving the Temporary Expanded Process Could Help Reduce Borrower Confusion*, [GAO-19-595](#) (Washington, D.C.: Sept. 5, 2019).

<sup>20</sup>The Pennsylvania Higher Education Assistance Agency's FedLoan Servicing unit is the PSLF loan servicer. The PSLF loan servicer is the exclusive loan servicer for borrowers pursuing forgiveness through PSLF and the temporary expanded process.

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quality of life matters, among other things. This office develops policies, plans, and programs for recruitment, education, training, and compensation—including benefits and incentives—for all DOD personnel as well as quality of life activities, such as financial planning and tuition assistance for service members.<sup>21</sup> Within this office, the:

- Assistant Secretary of Defense for Manpower and Reserve Affairs oversees both military personnel policy and civilian personnel policy through the Deputy Assistant Secretary of Defense for Military Personnel Policy and the Deputy Assistant Secretary of Defense for Civilian Personnel Policy;
- Assistant Secretary of Defense for Readiness develops policies and plans for promoting and sustaining service member financial readiness, and oversees related financial literacy training and counseling programs;
- Defense Human Resource Activity develops guidance on civilian personnel policy; provides program support in benefits and readiness areas; and conducts management, research, and analysis of personnel data; and
- Defense Civilian Personnel Advisory Service develops and oversees DOD civilian human resources plans, policies, and programs for civilian employees.

In addition to these DOD offices, the military departments and other DOD components implement DOD and service-specific personnel policies, human resources activities, and benefits programs.

DOD, the military departments, and other DOD components also administer a student loan repayment program, which provides student loan payments to certain DOD personnel in exchange for commitments to remain employed at DOD for a specified period of time. DOD and the military departments determine eligibility requirements for the program, including which positions or career fields may qualify. Certain maximum limits apply to the program, and loan repayment amounts are considered

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<sup>21</sup>Department of Defense Directive 5124.02, *Under Secretary of Defense for Personnel and Readiness (USD(P&R))*, para. 4.1 (June 23, 2008). The Under Secretary of Defense for Intelligence and Security exercises oversight and policy responsibilities for certain personnel matters within the defense intelligence and security components. *Id.* paras. 4.1.1, 4.1.4.

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taxable income for the recipient.<sup>22</sup> In contrast, loan forgiveness through PSLF is not considered taxable income, does not include maximum limits on the amount forgiven, and is available to all DOD personnel who meet program requirements.<sup>23</sup>

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## While Some DOD Personnel Are Pursuing PSLF, Few Have Received Loan Forgiveness to Date and DOD Has Shared Limited Information about the Program

Over 67,000 DOD Personnel Have Taken an Initial Step to Pursue PSLF and 287 Have Received Loan Forgiveness to Date

Of the almost 3 million DOD personnel, about 2 percent (or 67,237) have taken the optional first step toward pursuing the PSLF program by requesting certification of their employment and loans as eligible (see figure 3), and 61,715 have had their employment and loans certified as of

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<sup>22</sup>DOD guidance provides that, in the case of regular component service members, the portion or amount of a loan that may be repaid is 33 and one-third percent or \$1,500, whichever is greater, for each year of service. There is no statutory limit to the total amount that may be repaid, although military departments must clearly state the total amount to be repaid in the loan repayment agreement. DOD Instruction 1304.36, para. 3.3.a. In the case of civilian personnel, there is a statutory annual limitation of \$10,000 and aggregate limitation of \$60,000 for any one employee. DOD Instruction 1400.25, vol. 537, para. 3.e.

<sup>23</sup>With respect to the amount forgiven, section 685.219(d) of Title 34, Code of Federal Regulations, provides that the Secretary forgives the principal and accrued interest that remains on all eligible loans for which loan forgiveness is requested, after the borrower makes the 120 monthly qualifying payments.

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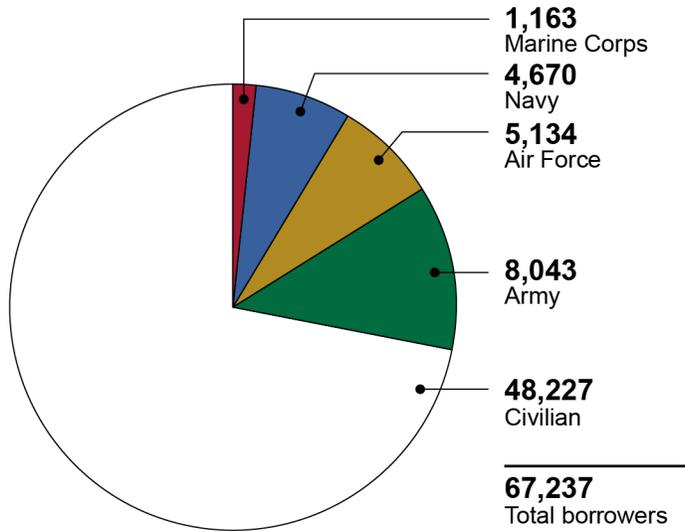
January 31, 2020, according to data from Education.<sup>24</sup> Of the personnel that requested certification of employment and loans, about 72 percent (or 48,227) were DOD civilian employees, and about 28 percent (or 19,010) were service members, with a majority in active duty and the remaining in the reserves.<sup>25</sup>

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<sup>24</sup>As discussed in the background, a borrower initiates the process of employment and loan certification with a request form. Next, Education determines if the borrower's loans qualify, if the borrower's employment qualifies, and how many qualifying payments the borrower has made. Education then informs the borrower if the employment and loans qualify for PSLF and, if so, the number of qualifying payments made. This step is optional and not a requirement before submitting an application for forgiveness. However, Education's website indicates that, if borrowers do not have their employment and loans certified prior to applying for PSLF, they will be required to take action for certification of each employer when they apply for forgiveness. As of January 31, 2020, Education reported that, in total, about 1.3 million unique borrowers have had their employment and loans certified. DOD personnel account for about 5 percent of the unique borrowers to have had their employment and loans certified. In November 2020, Education released a new combined PSLF form that serves as the application for loan forgiveness, the temporary expanded option, and certification requests.

<sup>25</sup>The Marine Corps has only a single employment identification number for both active duty and reserves. As such, we excluded this military service from our analysis when comparing active duty and reserves employment and loan certifications, but included them in the overall number of DOD personnel that have requested to have their employment and loans certified.

**Figure 3: Number of Department of Defense (DOD) Personnel Who Requested Certification of Their Employment and Loans, by Civilian Employees and Military Service Members, as of January 31, 2020**



Source: GAO analysis of Department of Education data. | GAO-21-65

Note: The civilian category includes all civilian personnel within DOD, including civilian employees within DOD's military services. The military services include both active-duty and reserve service members.

While some DOD personnel have taken the optional first step of having their employment and loans certified, many more could potentially benefit from the PSLF program. For example, as of January 23, 2020, there were 176,906 active-duty service members with federal loans eligible for the PSLF program or loans that could be consolidated into new qualifying loans, according to Education data.<sup>26</sup> However, as of January 31, 2020, only about 11 percent (or 19,010) of these service members had submitted requests to have their employment and loans certified as

<sup>26</sup>We received data from two sources within or associated with Education, FSA, and the PSLF loan servicer. The data from FSA were as of January 23, 2020. The PSLF loan servicer provided data from multiple dates and we are using January 31, 2020 for reporting throughout this report. The data on the number of service members with qualifying loans were only available in the FSA data set, which is why the data are as of a different date. For more details on the Education data sources see appendix I. Education officials provided an update, as of February 17, 2021, stating that, 178,215 active-duty service members had loans in the Direct Loan Program and, thus, may be eligible for PSLF or the temporary expanded option. The update also stated that another 16,195 active-duty service members had federal loans that could be consolidated into new qualifying loans.

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eligible for PSLF. The remaining approximately 89 percent (157,896) of service members that have yet to take the first optional step toward loan forgiveness could potentially benefit from the PSLF program if they made enough qualifying payments and met the other eligibility criteria (including consolidation into qualifying loans, where necessary).<sup>27</sup> As, according to Education officials, because data are not available on DOD civilian employees with federal loans eligible for the PSLF program, it is unknown how many of them could potentially benefit from the PSLF program.<sup>28</sup>

From the beginning of the PSLF program through January 31, 2020, 287 DOD personnel met all eligibility requirements and received loan forgiveness, according to Education data (see figure 4). The 287 DOD borrowers that received forgiveness comprise about 10 percent of all borrowers who received forgiveness.<sup>29</sup> About 57 percent (or 163) of DOD personnel who have received forgiveness are civilians and about 43 percent (or 124) are military service members.<sup>30</sup> Amongst service members in the Army, Navy, and Air Force who have received forgiveness, almost all are active duty, and the remaining are in the reserves.<sup>31</sup>

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<sup>27</sup>Education data indicates that about half of active-duty service members with student loans had balances over \$13,000, as of January 23, 2020. However, borrowers with small student loan balances can still face repayment challenges and tend to default on their student loans at higher rates, according to Education data.

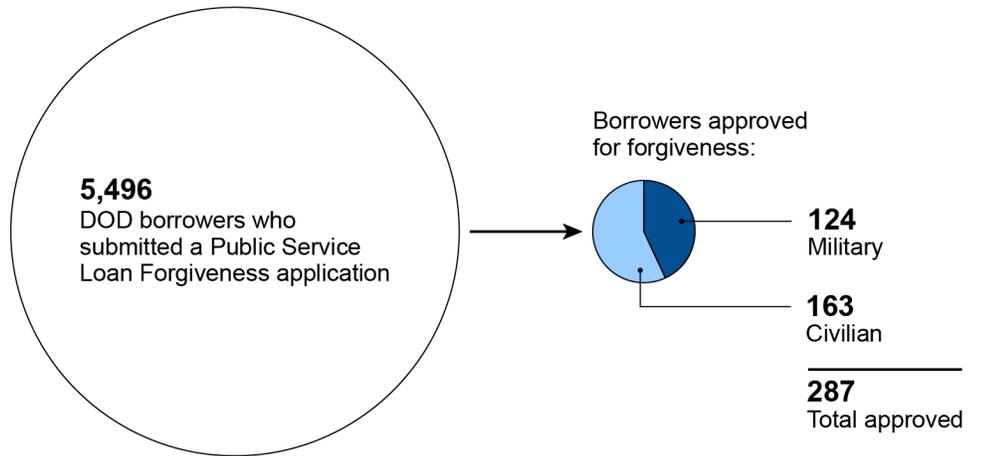
<sup>28</sup>To assure benefits and protections of the Servicemembers Civil Relief Act (SCRA), Education maintains information on service members' federal student loans, which we were able to use to calculate the service member population that could be eligible for PSLF. Most DOD civilian personnel have earned bachelors' or advanced degrees that can result in large student loan debts, but data is not readily available on the loan balances of civilian personnel. The SCRA does not apply to DOD civilian personnel, and, thus, Education does not maintain data on them.

<sup>29</sup>As of January 31, 2020, FSA reported that 2,896 unique borrowers across the federal government and other entities in total have received forgiveness through the PSLF program or the temporary expanded option. As individual borrowers can submit multiple applications, unique borrowers only counts the number of borrowers, not the total number of applications.

<sup>30</sup>The 124 service members that received forgiveness included 42 from the Air Force, 37 from the Navy, 34 from the Army, and 11 from the Marine Corps.

<sup>31</sup>The Marine Corps has only a single employment identification number for both active duty and reserves. As such, we excluded them from our analysis of active duty and reserves applications for the PSLF program.

**Figure 4: Number of Department of Defense (DOD) Borrowers Who Applied For Public Service Loan Forgiveness and Received Forgiveness, by Civilian Employees and Military Service Members, as of January 31, 2020**



Source: GAO analysis of Department of Education data. | GAO-21-65

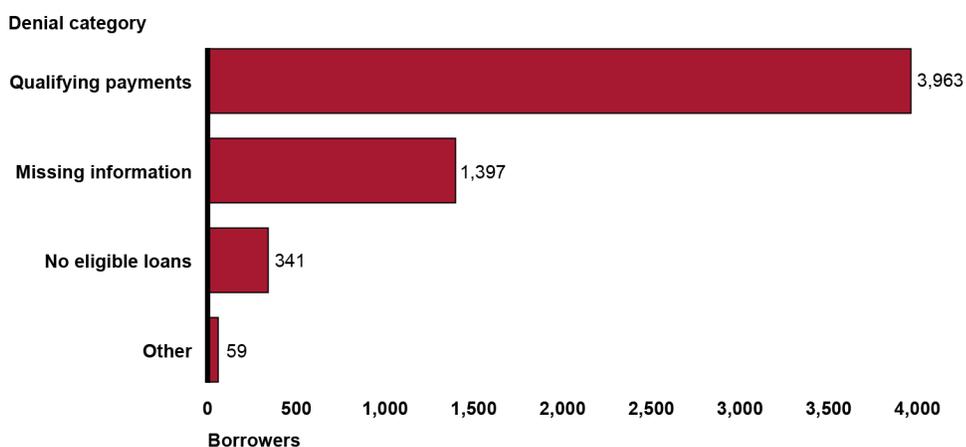
Note: The civilian category includes all civilian personnel within DOD, including DOD civilian employees within DOD's military services. The military services include both active-duty and reserve service members. The number of borrowers approved for forgiveness includes those who were approved through both the Public Service Loan Forgiveness (PSLF) application process and the temporary expanded option. Prior to the recent consolidation of the PSLF application and temporary expanded option requests into a single form, individuals could submit a request for the temporary expanded option after submitting a PSLF application and having the application denied. Of the 5,496 borrowers that submitted PSLF applications, 1,560 borrowers also submitted requests for the temporary expanded option. DOD personnel could be granted forgiveness without having taken the optional step of having their employment and loans certified earlier in the process. The 287 DOD personnel who have had loans forgiven do not necessarily overlap with the 67,237 personnel who have submitted to have their employment and loans certified.

Education denied the majority of DOD personnel who submitted PSLF applications—about 94 percent (or 5,180)—according to January 31, 2020 data from Education. This denial rate for DOD personnel submitting PSLF applications is comparable to the high denial rate for the program as whole.<sup>32</sup> We previously found that many borrowers were confused by the PSLF program's requirements, and our previous recommendations have highlighted specific areas where borrowers would benefit from more

<sup>32</sup>The 94 percent PSLF denial rate for DOD personnel is comparable to, but slightly lower than the 99 percent overall PSLF denial rates we reported in September 2019. See [GAO-19-717T](#). This rate does not include denials from the temporary expanded option.

information and better service.<sup>33</sup> According to these data, the three most common reasons for denials of PSLF applications from DOD personnel were not enough qualifying payments, missing information such as a signature on the form, and no eligible loans (see figure 5).<sup>34</sup>

**Figure 5: Number of Public Service Loan Forgiveness Application Denials for Department of Defense Personnel, by Denial Category, as of January 31, 2020**



Source: GAO analysis of Department of Education data. | GAO-21-65

Note: According to the Department of Education, it is possible for one Public Service Loan Forgiveness application to be denied for multiple reasons. An application can be denied for missing information if any of the fields on the application, including signatures or employer information, are left blank, according to Education officials. The “other” category of denials is comprised of issues regarding employment dates, employer not eligible, loan status, and a general application denial category.

As of January 31, 2020, Education has also denied about 31 percent (or 20,832) requests from DOD personnel who submitted forms to have their

<sup>33</sup>[GAO-19-717T](#). A complete list of recommendations regarding the PSLF program and their current implementation statuses are presented in appendix II of this report.

<sup>34</sup>According to an Education official, Education can deny a PSLF application for more than one reason. Thus, the sum of denials by reason is larger than the total number of applications denied.

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employment and loans certified as eligible for the PSLF program.<sup>35</sup> About 94 percent (or 19,641) of the denials were due to missing information on the form, such as those without signatures or employer information, according to data from Education.

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## DOD Has Shared Limited Information about the Program with Its Personnel

DOD shares information about the PSLF program with personnel through three sources: DOD officials, benefits webpages, and financial literacy training. However, each of these sources only provides limited information about the PSLF program to DOD personnel. Availability of information about the PSLF program throughout the department has the potential to affect the number of DOD personnel pursuing and receiving loan forgiveness through the program.

First, DOD officials share limited information about PSLF because they are generally unfamiliar with the program. DOD officials from 19 of the 34 DOD offices engaged in military and civilian personnel management, benefits, or recruitment we interviewed were generally unfamiliar with the PSLF program, including specifics about its eligibility requirements and application process, prior to our review.<sup>36</sup> Officials at one of these offices stated that if personnel approached their office for information about the PSLF program, they would typically direct that person to Education's PSLF webpage. Furthermore, one official we spoke to stated they do not proactively share PSLF information with personnel because information on the program is not readily accessible. The majority of DOD officials we

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<sup>35</sup>The data we received from Education counts the number of borrowers that submitted forms to have loans and employment certified, the number of these submissions approved, and the number of these submissions denied. According to an official at the PSLF loan servicer, a borrower could submit an application in 2 consecutive years, being denied the first year and approved in the second year. In this case, the borrower would be counted once in the number of borrowers who submitted forms to have loans and employment certified, once as being denied, and once as being approved. Therefore, the sum of the number of denials and approvals is more than the number of submissions.

<sup>36</sup>Officials from four DOD offices we interviewed were also generally unfamiliar with how the PSLF program works in conjunction with the DOD student loan repayment program. This is partially due to a lack of collaboration between DOD and Education, as discussed later in this report. In addition to these officials, we interviewed DOD and military service officials who work on financial readiness topics, and they indicated some familiarity with the PSLF program. We discuss financial readiness related to the PSLF program in more detail later in this section. The Air Force's and the Navy's Judge Advocate General's Corps, the Judge Advocate Division of the Marine Corps, and the Army's Chaplain Corps use the PSLF program in their recruitment and retention efforts as discussed in more detail later in this report.

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interviewed were also uncertain of the extent to which DOD personnel are aware of the PSLF program and its requirements.

Second, DOD provides limited information about the PSLF program on its benefits webpages. We reviewed nine webpages used to share information on DOD personnel benefits, including education benefits, for each of the military services and DOD civilians.<sup>37</sup> We found that only one of these benefits webpages provided information on the PSLF program.<sup>38</sup>

Third, DOD shares some information about the PSLF program during financial literacy training for military personnel. Officials we interviewed stated that active-duty service members receive financial literacy training when they arrive at their first post or base.<sup>39</sup> This training covers a number of financial literacy topics, including options for education financing and an introduction to the PSLF program.<sup>40</sup> We reviewed eight presentations and materials on financial readiness from DOD and the military services.<sup>41</sup> Among these eight resources, five provided general

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<sup>37</sup>We identified the webpages from interviews with DOD and service-level officials, web searches for service-level recruitment webpages, and web searches for specialty career field recruitment webpages. See appendix I for more details.

<sup>38</sup>We reviewed a total of 53 pieces of DOD and other agency materials. Nine of these materials are informational on DOD personnel benefits of DOD and each of the military services, as discussed here. Thirty are DOD recruitment webpages and the majority do not mention the PSLF program, as discussed later in this report. The remaining 14 are presentations and materials on financial readiness for DOD personnel from military services, Education, and the Consumer Financial Protection Bureau. After our initial analysis, DOD's Office of Financial Readiness published a PSLF program fact sheet on its website.

<sup>39</sup>Section 992 of Title 10, U.S. Code, requires the military departments to carry out programs to provide comprehensive financial literacy training for members of the armed forces. DOD's 2018 *Annual Report on the Financial Literacy and Preparedness of Members of the Armed Forces* states the DOD position that financial readiness is related to overall mission readiness. DOD's Office of Financial Readiness leads DOD's efforts to support a mission-ready force through policy, programs, and advocacy.

<sup>40</sup>According to DOD officials, while DOD provides information on education financing and repayment at the first duty station in accordance with DOD guidance, PSLF or other student loan topics are not training topics specifically identified in the statute requiring financial literacy training.

<sup>41</sup>We also reviewed five presentations and materials from Education and the Consumer Financial Protection Bureau. All of these materials provided more information about PSLF and eligibility requirements.

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information on the PSLF program, and four provided information on the program's eligibility requirements. Additionally, one DOD financial readiness official stated that the PSLF program is a small piece of the service member training that they cover for about 15 minutes as part of an 8-hour training. Furthermore, according to DOD officials, civilian DOD personnel do not receive financial literacy training on PSLF.

Increasing awareness about benefits is one of the key talent management strategies identified in our recent work about federal agency management of the workforce.<sup>42</sup> If DOD provides its personnel with more information about the PSLF program, its eligibility requirements, and its application process, the department could increase awareness of the program. For example, DOD could update its benefits webpages to include details on the program's eligibility requirements and application process. Increased awareness of the program could, in turn, encourage more DOD personnel to pursue loan forgiveness, which could lead to more personnel receiving forgiveness.<sup>43</sup>

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## Education Has Not Shared Complete Information about the PSLF Program with DOD

Education has not shared complete information about the PSLF program with DOD that could help DOD officials and personnel to take full advantage of the program. As the program administrator, Education has specialized knowledge about the PSLF program that could benefit DOD officials and personnel. Specifically, Education has not shared summary information about potentially eligible personnel with officials and could share additional information about PSLF program requirements with DOD and its personnel.

**Potentially eligible personnel.** Education has not shared summary information with DOD about its personnel who have taken steps to certify their employment and loans for PSLF, or about service members who have Direct Loans that may make them eligible for loan forgiveness through PSLF if they meet other eligibility requirements. Such summary level information could include the number of DOD personnel by military

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<sup>42</sup>While the strategies in our prior report are not an exhaustive list, collectively they suggest basic steps that agencies can take within existing authorities to position themselves to meet their talent needs. [GAO-19-181](#).

<sup>43</sup>DOD could also use the PSLF program for recruitment and retention, as discussed later in this report.

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service or field of study.<sup>44</sup> As discussed earlier, Education's data shows that 176,906 active-duty service members have or could have federal loans eligible for the PSLF program, but only 19,010 service members requested to have their employment and loans certified.<sup>45</sup> DOD is not the program's administrator, and officials stated that DOD does not have direct access to information on DOD personnel who have taken steps to certify their employment and loans as eligible for the PSLF program.

DOD could potentially use information on DOD personnel to identify populations for which additional PSLF program information could be useful. For example, Army officials stated that it would be helpful to see how many Army personnel are pursuing PSLF or have applied for loan forgiveness using this information. Specifically, an official stated if these data show that a large number of Army personnel are interested in PSLF, the Army may want to include more information about PSLF in its incentives explanations. An Education official stated that, after determining the number of service members with federal student loans to respond to a question for this review, Education shared the number with DOD's Office of Financial Readiness. However, this did not include information Education has on DOD personnel's participation in the PSLF program, and the information was not shared with the offices within the department responsible for DOD personnel policy or benefits.

**PSLF program requirements.** As we have previously reported, Education conducts general outreach to borrowers on the PSLF program, through efforts such as webinars for borrowers and outreach to schools.<sup>46</sup> Education officials stated that they continue to produce materials that are available to all borrowers on the PSLF program. These officials also stated that at the request of the Office of Personnel Management,

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<sup>44</sup>Although Education may be unable to share personally identifiable information on individual borrowers due to privacy concerns, the department shares other types of summary level data, such as total numbers of PSLF approvals and denials, with the public.

<sup>45</sup>Education officials stated that the department does not collect similar loan data on DOD civilian employees. To assure benefits and protections of the Servicemembers Civil Relief Act, Education maintains information on service members' federal student loans; however, the act does not apply to civilian personnel. As noted above, Education data shows that, as of January 23, 2020, 176,906 active-duty service members had federal loans eligible for the PSLF program or had loans that could be consolidated into new qualifying loans.

<sup>46</sup>GAO, *Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers*, [GAO-18-547](#) (Washington, D.C.: Sept. 5, 2018).

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Education officials shared general information about the PSLF program during the October 2019 meeting of the Chief Human Capital Officers Council, whose members are federal entities, including DOD.<sup>47</sup>

However, Education officials stated that they do not generally share detailed information about the PSLF program or program requirements with DOD officials and its personnel. For example, Education has not shared the benefits of using the PSLF program in conjunction with DOD's student loan repayment program. Specifically, in 2015, Education amended regulations for the PSLF program to allow annual payments made under DOD's student loan repayment program to count towards up to 12 qualifying payments for the PSLF program.<sup>48</sup> Education officials stated they have not shared information on this change with DOD officials, and those we spoke with at the department were generally unfamiliar with this provision. In addition, Education's PSLF program website does not provide borrowers with details on the proactive steps that are necessary to take advantage of it or explain how these annual payments can and cannot be used.<sup>49</sup> For example, according to Education officials, these payments cannot be applied towards future qualifying payments.

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<sup>47</sup>Membership in the Chief Human Capital Officers Council consists of Chief Human Capital Officers—who handle human resources management issues within their agencies—from various Executive Departments and agencies, including DOD. According to officials from the Office of Personnel Management, as an active participant of the Chief Human Capital Officers Council, DOD representatives likely attended its meeting.

<sup>48</sup>These changes were effective July 1, 2016. 80 Fed. Reg. 67,204 (Oct. 30, 2015) (amending 34 C.F.R. § 685.219(c)). The regulation allows a lump-sum payment made under the DOD student loan repayment program for eligible loans to count as multiple qualifying payments toward the PSLF program. Under this option, Education counts the lump-sum payment by DOD as either 1) the number of payments resulting from dividing the amount of the lump-sum payment by the monthly payment amount the borrower would have made, or 2) 12 payments, whichever is less. Because DOD payments are made after the employee's credited year of service, these qualifying payments are applied retroactively.

<sup>49</sup>According to Education officials, to take advantage of this provision, borrowers must place their loans in deferment or forbearance status and forego personal monthly loan payments for the year prior to the lump sum payment as well as seek certification of their employment and loans as eligible for the PSLF program. Forbearance is a period during which monthly payments are temporarily postponed or reduced, but student loan interest continues to accrue. Deferment is similar, but interest continues to accrue on only unsubsidized loans (and generally not subsidized loans).

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Information sharing has been limited, in part, because Education and DOD have not yet collaborated effectively to share PSLF program information. Education officials said they would be willing to work with DOD officials regarding the PSLF program if DOD officials expressed interest in collaborating. Additionally, DOD personnel officials expressed to us interest in the information and data available from Education as potential tools to assist their work with personnel and promotional efforts. Further, officials from some of the military services noted the potential benefits of enhanced collaboration. For example, a Marine Corps official stated that direct communication between the two departments would be useful. According to this official, having a point of contact at Education to help address issues related to the PSLF program could give its personnel confidence in the program.

DOD and the military services have collaborated with other federal entities beyond Education to help service members learn more about student loans.<sup>50</sup> For example, Education's Office of Federal Student Aid has collaborated with DOD's Office of Financial Readiness on student loan topics relevant to service members, according to officials from both departments. Specifically, a DOD official stated that DOD's Office of Financial Readiness has worked with Education and the Department of Veterans Affairs to publicize loan-related benefits available for deployed service members and to run a social media awareness campaign on financial readiness. Education officials also stated that, while the department has worked with DOD's Office of Financial Readiness for active-duty service members, the collaboration was not focused specifically on PSLF and Education does not have similar contacts for responsible counterparts on the DOD civilian side. Establishing points of contact within the departments could be a way to enhance information sharing.

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<sup>50</sup>DOD's Office of Financial Readiness and military service offices that provide financial readiness support have existing relationships with the Consumer Financial Protection Bureau's Office of Servicemember Affairs which included educating financial counselors as well as service members about financial products and services, such as student loans and repayment options such as the PSLF program. The Consumer Financial Protection Bureau's Office of Servicemember Affairs works to help military families overcome unique financial challenges by providing educational resources, monitoring complaints, and working with other agencies to solve problems faced by service members. According to Bureau officials, the PSLF program comprises a small portion of all the financial issues addressed by the Office of Servicemember Affairs.

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Education could also use existing information resources to share PSLF program information. For example, Education has published a student loan guide dedicated to service members with federal student loans which briefly mentions PSLF.<sup>51</sup> However, Education has not updated its guide to include references to applying for loan forgiveness, which began in September 2017, or to the temporary expanded process established in 2018. In addition, the guide does not include information related to applying lump-sum payments from DOD's student loan repayment program towards multiple qualifying payments for PSLF eligibility.

We have previously reported that leading practices of high-performing organizations include fostering collaboration both within and across organizational boundaries to achieve results, and that possible mechanisms for interagency collaboration, such as interagency groups or agreements and memoranda of understanding, can help improve information sharing and communication.<sup>52</sup> The most recent strategic plan for Education's Office of Federal Student Aid includes goals that are intended to share more data with external stakeholders and foster trust and collaboration among stakeholders.<sup>53</sup> In addition, according to its recent annual report, Education aims to be the most trusted and reliable source of information on federal student aid.<sup>54</sup> *Standards for Internal Control in the Federal Government* states that agencies should

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<sup>51</sup>Department of Education, Office of Federal Student Aid, *For Members of the U.S. Armed Forces: What you need to know about your federal student loan benefits*.

<sup>52</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012).

<sup>53</sup>Department of Education, Office of Federal Student Aid, *Strategic Plan FY 2015-19* (Washington, D.C.: November 2015). Education's recently released strategic plan for fiscal years 2020-24 includes similar goals to the ones that we used from the previous strategic plan to evaluate the department's efforts. This new strategic plan has not been finalized. Education states in its Fiscal Year 2019 Annual Report that other agencies in the Executive Branch are stakeholders, and Education's engagement with these other agencies include providing data and information for decision-making and providing recommendations for implementation. The agency's list of stakeholders primarily includes those directly involved in the loan process. Department of Education, Federal Student Aid, *FY 2019 Annual Report* (Washington, D.C.: Nov. 15, 2019).

<sup>54</sup>Department of Education, Federal Student Aid, *FY 2019 Annual Report* (Washington, D.C.: Nov. 15, 2019).

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communicate the necessary quality information to those who need it.<sup>55</sup> Additionally, DOD guidance documents outline responsibilities related to the department's student loan repayment program, including disseminating information. Specifically, DOD Instruction 1304.36 assigns responsibility to military departments for disseminating information to raise program awareness among service members and other eligible persons, and, in the case of civilian employees, DOD Instruction 1400.25 assigns responsibility for ensuring application of related civilian personnel policy throughout DOD to the Deputy Assistant Secretary of Defense for Civilian Personnel Policy.<sup>56</sup>

Education could take additional steps to improve information sharing about PSLF. Collaboration between Education and DOD would allow DOD to obtain updated information about the PSLF program or its personnel who have taken the first step or who may be eligible for the program. For example, the departments could use interagency groups or agreements and memoranda of understanding to help improve information sharing and communication. In addition, such collaboration would allow DOD to use the information from Education to identify groups of personnel who may qualify for the PSLF program and help ensure those personnel are aware of program benefits and requirements. DOD could also use the information from Education to raise awareness among DOD personnel who are eligible for both the PSLF program and DOD's student loan repayment program about steps needed to take advantage of both programs. Further, by updating the student loan guide to include information about applying for forgiveness through PSLF, its temporary expanded process, and the student loan repayment provision, Education could better position DOD officials to provide quality information about the PSLF program, and DOD personnel to make more informed decisions about their student loans in order to receive the full benefits of loan forgiveness, if they meet program requirements.

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<sup>55</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>56</sup>DOD Instruction 1304.36, *Education Loan Repayment Program*, para. 2.3.d (Sept. 12, 2018); DOD Instruction 1400.25, vol. 537, *DOD Civilian Personnel Management System: Student Loan Repayment*, para. 2.2 (May 7, 2020). DOD refers to its student loan repayment program as the "Education Loan Repayment Program."

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## DOD Does Not Widely Use the PSLF Program for Recruitment and Retention to Promote Readiness

Officials from DOD, the military services, DOD components, and a selection of personnel offices in specific DOD career fields told us they do not widely use the PSLF program as part of their formal recruitment and retention strategies to promote readiness.<sup>57</sup> Specifically, of the 34 DOD offices engaged in personnel management, benefits, or recruitment we contacted, all but four said that they do not use the PSLF program for recruitment and retention.<sup>58</sup> Across the military services and these career specialties, we reviewed 30 DOD webpages on recruitment and found that PSLF was mentioned in only two.<sup>59</sup>

The DOD Fiscal Year 2020-2021 Civilian Human Capital Operating Plan includes objectives on delivering talent by improving recruitment and hiring. Specifically, these objectives are intended to enable DOD to find the right skills and talent for current and future work, retain talent in high-demand careers, and become competitive for targeted talent.<sup>60</sup> Similarly, the National Defense Business Operations Plan for fiscal years 2018 to 2022 states that DOD must have the right personnel and human capital resources “in the right places, at the right time, at the right levels, and with

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<sup>57</sup>We identified a selection of offices in specialty career fields through interviews, DOD materials such as recruitment webpages, and information on the usage of DOD’s student loan repayment program. These specialty career fields were engineers, nurses, contracting and acquisition professionals, judge advocates, information technology specialists, chaplains, musicians, and finance professionals. Information we received include DOD materials such as DOD recruitment webpages and information on the usage of DOD’s student loan repayment program. See appendix I for more details.

<sup>58</sup>The four exceptions are the Judge Advocate General’s Corps from the Air Force and Navy, the Judge Advocate Division of the Marine Corps, and the Army’s Chaplain Corps. Additionally, the Office of Financial Readiness for each military service provides general information to service members on the PSLF program during financial literacy training, as discussed earlier in this report, but did not indicate that they use PSLF for recruitment or retention.

<sup>59</sup>The two recruitment webpages that mention PSLF did not provide details on eligibility requirements or where to look for more information on the program. We reviewed a total of 53 DOD and other agency materials. Thirty are DOD recruitment webpages, as discussed here. Nine of these materials are informational on DOD personnel benefits of DOD and each of the military services, as discussed earlier in the report. The remaining 14 are presentations and materials on financial readiness for DOD personnel from military services, Education, and the Consumer Financial Protection Bureau.

<sup>60</sup>Department of Defense, *FY 2020 – FY 2021 Department of Defense Civilian Human Capital Operating Plan* (October 2019).

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the right skills to provide for the nation's defense."<sup>61</sup> However, DOD does not generally use the PSLF program—a tool that could improve recruitment and retention—to achieve its stated human capital objectives.

DOD has faced challenges in recruiting and retaining personnel in specific career fields. For example, we previously reported that DOD has faced challenges in recruiting and retaining physicians and dentists as well as information technology personnel.<sup>62</sup> Additionally, we have reported the range of challenges that DOD laboratories experience in hiring qualified candidates.<sup>63</sup>

DOD officials from 12 of the 34 offices engaged in personnel management, benefits, or recruitment we interviewed stated that they prefer to use other DOD benefits and incentives that DOD directly controls, such as bonuses or DOD's student loan repayment program, for recruitment and retention. For example, officials at one DOD component told us that the component uses DOD's student loan repayment program because its analysis showed that it has been effective at encouraging retention. Additionally, a DOD official noted the public perception of Education's PSLF program, which has been influenced by reports of low rates of forgiveness approval, could influence effectiveness of the program as a recruitment and retention tool. However, DOD has an opportunity to enhance recruitment and retention efforts by advertising that the PSLF program can be used in conjunction with DOD's student loan repayment program, can offer broader benefits compared to DOD's program alone, and is available at no cost for DOD. (See table 1.)

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<sup>61</sup>Department of Defense, *FY 2018 – FY 2022 National Defense Business Operations Appendices* (Washington, D.C.: May 2018).

<sup>62</sup>GAO, *Defense Health Care: DOD Should Collect and Use Key Information to Make Decisions about Incentives for Physicians and Dentists*, [GAO-20-165](#) (Washington, D.C.: Jan. 15, 2020); and *Human Capital: Improving Federal Recruiting and Hiring Efforts*, [GAO-19-696T](#) (Washington, D.C.: July 30, 2019).

<sup>63</sup>GAO, *DOD Personnel: Further Actions Needed to Strengthen Oversight and Coordination of Defense Laboratories' Hiring Efforts*, [GAO-18-417](#) (Washington, D.C.: May 30, 2018). These prior reports contain six recommendations that have not been fully implemented by DOD about how to best use data and adjust pay or benefits to recruit or retain personnel.

**Table 1: Differences between the Department of Defense’s (DOD) Student Loan Repayment Program and the Department of Education’s (Education) Public Service Loan Forgiveness Program**

	<b>DOD’s Student Loan Repayment Program</b>	<b>Education’s Public Service Loan Forgiveness Program</b>
<b>Eligibility</b>	Certain DOD positions are eligible, subject to change.	All full-time DOD personnel are eligible as public service employees.
<b>Cap on forgiveness</b>	There is a cap on the amount that borrowers may receive annually and, in the case of civilian employees, throughout their service.	There is no cap on the remaining balance amount forgiven.
<b>Funding source</b>	DOD funds the programs from its budget.	Education cancels the balance of interest and principal due.
<b>Tax incidence</b>	Recipients pay taxes on the amount received.	Recipients do not pay taxes on the amount forgiven.

Source: GAO analysis of DOD and Education information. | GAO-21-65

The Judge Advocate General’s Corps from the Air Force and Navy, and the Judge Advocate Division of the Marine Corps have demonstrated some success using PSLF as part of their recruitment and retention efforts. Officials from these entities provide information about the PSLF program to DOD personnel starting at recruitment and throughout their employment, according to officials and documents we reviewed. Officials from Judge Advocate General’s Corps components stated that the opportunity to pursue loan forgiveness is one reason individuals join and stay in the Corps. For example, in a 2018 Navy Judge Advocate General’s Corps survey, 94 percent of respondents indicated that they would be more likely to leave the Judge Advocate General’s Corps if the PSLF program were eliminated. Additionally, a Marine Corps survey found that at least 20 out of 62 Marine Corps Judge Advocate respondents would not have joined the Marine Corps if the PSLF program had not been an option.

DOD could potentially replicate the positive effect of PSLF on recruitment and retention with the Judge Advocate Generals’ Corps across the rest of the department, but DOD does not have guidance on how it or the services could use the PSLF program. While DOD has provided guidance on communicating information regarding its student loan repayment program, it does not have similar guidance on the PSLF program. Specifically, staff in a position to recruit and retain personnel, such as front-line managers and human resource employees, could use the PSLF program to aid in their recruitment and retention efforts. For example, an official from the United States Navy Band stated that PSLF has the potential to be a high-impact retention tool for its personnel, but because of a lack of available guidance, the program is underused. According to another DOD official, with data from Education on DOD personnel use of

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the PSLF program, DOD would be better able to assess the effect of the program on recruitment and retention. Further, an additional DOD official stated that this type of information and data would allow the department to better target recruitment and retention strategies associated with the PSLF program.

DOD could enhance its efforts to recruit and retain personnel to promote readiness by issuing department and military service guidance about how the PSLF program may be used as a recruitment and retention tool. Specifically, DOD could use the PSLF program in conjunction with other recruitment and retention programs, such as its student loan repayment program. Additionally, DOD's front-line managers and human resource employees, among others, could use the PSLF program to help recruit and retain individuals with higher levels of education because the program allows for forgiveness of larger student loan amounts than DOD's student loan repayment program. The benefits of the program are also available at no cost to DOD.

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## Conclusions

As the largest federal employer with a military and civilian workforce numbering almost 3 million, DOD has one of the largest pools of employees potentially eligible for loan forgiveness offered through the PSLF program. A congressional committee has cited the potential effect of the PSLF program in encouraging Americans to pursue public service careers, such as those in military and civilian service at DOD.<sup>64</sup> By expanding awareness of the PSLF program, DOD has the potential to encourage larger numbers of DOD personnel with federal student loans to participate in the program and continue their careers at DOD. During this time of economic uncertainty and mounting student loan debt, expanded awareness of the program could also broaden its utility to DOD as a tool for recruitment and retention of personnel.

As the administrator of the PSLF program, Education has information about DOD personnel participation and specific information about the program that could be of value to DOD officials and to military and civilian personnel pursuing loan forgiveness through the PSLF program. More concerted efforts by Education to collaborate with DOD to provide information about the program—including summary information on DOD personnel participation and potentially eligible personnel as well as the program's eligibility requirements—would help to ensure that DOD officials are fully aware of the loan forgiveness options available through

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<sup>64</sup>See S. Rep. No. 116-48, at 181 (2019).

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the PSLF program, including provisions related to DOD's student loan repayment program that could benefit personnel who are eligible for both programs.

Enhanced collaboration between Education and DOD could also benefit DOD personnel by making available more information about PSLF, including ways to take full advantage of the program and its benefits, through DOD officials who have received and disseminated program information from Education as well as through Education resources such as an updated student loan guide for service members. In addition, DOD officials would benefit from more information and guidance related to the program's potential use as a tool for recruitment and retention to promote readiness, particularly in mission-critical career fields where DOD has faced challenges in recruiting and retaining personnel. Education, as the program administrator, is positioned to be a resource and partner to DOD as it pursues program information and considers the use of PSLF throughout DOD.

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## Recommendations for Executive Action

We are making a total of five recommendations, including three to DOD and two to Education. Specifically:

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness shares additional information about the PSLF program, including its eligibility requirements and application process, with DOD military and civilian personnel. For example, DOD could update its benefits webpages to include details on the program's eligibility requirements and application process.  
(Recommendation 1)

The Secretary of Education should ensure that the Chief Operating Officer of the Office of Federal Student Aid collaborates with officials in the Office of the Under Secretary of Defense for Personnel and Readiness to share information about the PSLF program, including current information on program participation and eligibility, PSLF program requirements, and the potential to pursue PSLF and DOD's student loan repayment. For example, Education and DOD could use interagency groups or agreements to help improve information sharing among department officials and with military and civilian personnel.  
(Recommendation 2)

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness collaborates with officials in Education's Office of Federal Student Aid to disseminate information

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about the PSLF program, including current information on program participation and eligibility, PSLF program requirements, and the potential to pursue PSLF and DOD's student loan repayment. For example, DOD and Education could use interagency groups or agreements to help improve information sharing among department officials and with military and civilian personnel. (Recommendation 3)

The Secretary of Education should ensure that the Chief Operating Officer of the Office of Federal Student Aid updates the student loan guide for service members to provide information on applying for the PSLF program and its temporary expanded process, as well as the steps borrowers can take to count their annual payment from DOD's student loan repayment program as multiple qualifying payments for the PSLF program. (Recommendation 4)

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness issues guidance to DOD and military service officials, such as front-line managers and human resources employees, about how the PSLF program could be used as a tool for recruitment and retention to promote readiness. (Recommendation 5)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DOD and Education for comment. In its written comments, reproduced in appendix III and appendix IV respectively, DOD partially agreed with the three recommendations addressed to DOD (Recommendations 1, 3, and 5), and Education agreed with the two recommendations directed towards its Office of Federal Student Aid (Recommendations 2 and 4). Both departments also provided technical comments, which we incorporated as appropriate. We also spoke with DOD officials about their written comments and included some of their verbal responses below.

DOD partially concurred with our first recommendation to share additional PSLF program information with personnel. In its written comments and verbal responses, DOD noted that while it has developed some educational materials for active-duty service members, it stated that Education—not DOD—is responsible for the PSLF program. Therefore, DOD stated that it plans to focus efforts only on ensuring personnel know where to seek further information from Education about the PSLF program's application process. While we recognize that Education is the administrator of the PSLF program, we believe DOD also should inform its military and civilian personnel about the full range of available benefits. As we noted in our report, DOD has taken limited steps to inform its

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personnel about the PSLF program, such as by only providing information on the PSLF program on one of the nine webpages we reviewed. Increasing awareness about benefits is one of the key talent management strategies identified in our recent work about federal agency workforce management. We continue to believe that DOD, as the nation's largest federal employer, should provide its almost 3 million personnel with more information about the PSLF program, which could raise awareness of the benefit and its eligibility requirements among potential applicants.

DOD partially concurred with our third recommendation to collaborate with Education to disseminate information about the PSLF program. In its written comments and verbal responses, DOD stated that it is committed to ensuring personnel can access accurate information about the PSLF program and will continue to work with Education on this effort, but reiterated that it is Education's responsibility to disseminate information about the program. As we discuss in our report, we believe that DOD should provide its military and civilian personnel with the best possible information about available benefits and should take proactive steps to coordinate with any department administering programs created to benefit its personnel. In addition, DOD would have a willing partner in its efforts to provide this information as Education has committed to collaborate with DOD to share information about the PSLF program. We continue to believe that effective collaboration between the departments could help DOD officials and its personnel take full advantage of the PSLF program.

DOD partially concurred with our fifth recommendation to issue guidance on the use of the PSLF program as a recruiting and retention tool. In its written comments, DOD stated that it strongly supported the availability of the PSLF program for DOD programs where personnel have substantial student loan debt, such as the Judge Advocate General's Corps. However, DOD stated that it does not believe the PSLF program is an effective military recruitment tool for most DOD areas where the department thinks student loan debts may be less substantial for applicants. As noted in our report, almost 200,000 active-duty service members have federal student loans, and Education data indicates that about half of active-duty service members with student loans have balances over \$13,000. Additionally, most DOD civilians have earned bachelors' or advanced degrees that can result in large student loan debts. However, even borrowers with smaller student loan balances can face challenges with repayment and tend to default on their student loans at higher rates, according to Education data. All these DOD personnel may benefit from the program if they meet eligibility requirements.

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In its verbal responses, DOD officials expressed concerns about the PSLF program—including its 10-year public service requirement—and indicated that it may not be a useful tool for the recruitment and retention of civilian personnel because DOD cannot guarantee eligibility in the program. However, as we noted in our report, some DOD components disagree with this assertion and believe that PSLF is an effective recruitment or retention tool for its personnel. Given DOD's critical mission needs, we believe it should consider the full range of tools available for use by the department. In addition, we believe DOD should position its military and civilian personnel to make informed decisions about their student loans, available benefits, and potential careers in public service within DOD or at other public service organizations.

We continue to believe that DOD has an opportunity to enhance its recruiting and retention efforts, particularly in mission-critical specialty career fields, by issuing guidance to DOD and military service officials about how the PSLF program could be used as a recruiting and retention tool. As stated in our report, DOD has faced recruitment and retention challenges in certain specialty career fields and has stated in its personnel and business plans its goals to position DOD to recruit and retain talent. We also continue to believe, as noted in our report, that specific knowledge about the PSLF program, such as its ability to be used in conjunction with other DOD programs and its availability—at no cost for DOD—could provide officials, including front-line managers and human resource employees, with another tool to strengthen their recruitment and retention efforts.

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We are sending copies of this report to appropriate congressional committees and to the Secretaries of Defense and Education. This report is also available at no charge on the GAO website at <http://www.gao.gov>.

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Should you or your staff have any questions about this report, please contact Tina Won Sherman at (202) 512-8461 or [ShermanT@gao.gov](mailto:ShermanT@gao.gov) or Melissa Emrey-Arras at (617) 788-0534 or [EmreyArrasM@gao.gov](mailto: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 V.



Tina Won Sherman  
Acting Director, Defense Capabilities and Management



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

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# Appendix I: Objectives, Scope, and Methodology

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Senate Report 116-48 included a provision for us to assess the effect of the Public Service Loan Forgiveness (PSLF) program on military and civilian recruitment and the effectiveness of the PSLF program at promoting military readiness.<sup>1</sup> In this report, we assess the extent to which (1) Department of Defense (DOD) personnel pursue and receive loan forgiveness through the PSLF program, (2) the Department of Education (Education) has shared information with DOD officials and its military and civilian personnel about the about the PSLF program, and (3) DOD uses the PSLF program for recruitment and retention to promote readiness.

To address our first objective, we analyzed data from Education's Office of Federal Student Aid (FSA) on the number of service members with qualifying loans and number of approved employment and loan certifications and PSLF applications. We additionally analyzed data from the PSLF loan servicer on the number of DOD personnel who have submitted applications for PSLF or the temporary expanded process, or requested to have their employment and loans certified as eligible for PSLF—an optional step that employees can use to track their eligibility and progress toward PSLF.<sup>2</sup> The data we analyzed covers all submitted applications and certification requests from DOD personnel through January 31, 2020, the most recent data available at the time of our review.

FSA has data on the number of service members with qualifying loans, number of DOD personnel who have had their employment and loans certified, and number of approved loan forgiveness applications. However, FSA does not have information on submissions and denials of applications. In order to identify the number of DOD personnel that submitted applications and the number that have been denied—by reason for denial—we used data from the PSLF loan servicer.

In order to show the difference in DOD personnel use of the PSLF program by civilian and military branch, active duty and reserves, we requested the FSA and PSLF loan servicer data separated by DOD employer identification number (EIN). We first identified all the DOD EINs through a review of federal EINs provided by DOD and Education and by

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<sup>1</sup>S. Rep. No. 116-48, at 181 (2019).

<sup>2</sup>The Pennsylvania Higher Education Assistance Agency's FedLoan Servicing unit is the exclusive loan servicer for borrowers pursuing forgiveness through PSLF and the temporary expanded process.

confirming our selections with our primary DOD point of contact, the Defense Civilian Personnel Advisory Service. In our data request to FSA and the PSLF loan servicer, we asked if they knew of any DOD EINs that we had missed and confirmed that all the EINs were included. (See table 2).

**Table 2: Department of Defense (DOD) Employer Identification Numbers (EIN) Used in Public Service Loan Forgiveness Data Request**

	EIN	EIN Description
<b>DOD Civilian EINs</b>	31-1575142	DOD Civilian
	75-1744396	DOD Non Appropriated Funds
	53-0205701	Defense Intelligence Agency
<b>DOD Active Military EINs</b>	35-9990000	DOD Active: Army
	84-9990000	DOD Active: Air Force
	34-9990000	DOD Active: Navy and Navy Cadet
	53-9990000	DOD Active: Marine Corps
<b>DOD Reserve Military EINs</b>	35-1819323	DOD Reserve: Army
	84-9980000	DOD Reserve: Air Force
	34-9980000	DOD Reserve: Navy
	53-9990000	DOD Reserve: Marine Corps

Source: Department of Education. | GAO-21-65

There were a few data extractions completed by Education and each had different timeframes. The initial data we received from FSA was from January 23, 2020. In our follow-up interview, FSA informed us that they were not able to report data with an “as of” date, but instead could only provide data for the date in which they performed the data retrieval. In order to be able to compare the data sets, we had the PSLF loan servicer complete a second data request to get data as of two points in time, January 23, 2020 and January 31, 2020. In this report, we use the January 31, 2020 data from the PSLF loan servicer when discussing the number of submitted applications, number of denied applications with reason for denial, and the number of approved applications for both employment and loan certification as well as loan forgiveness. We use the January 23, 2020 data from FSA to discuss the number of service members with qualifying loans.

We took several steps to assure that both the FSA data and the PSLF loan servicer data were reliable for the purposes of this review. First, we conducted a series of interviews with FSA officials and officials from the

PSLF loan servicer to determine the correct data and clarify any potential inconsistencies. Next, we reviewed relevant data dictionaries where available. When the final data sets were provided, we reviewed the code used by FSA and the PSLF loan servicer to collect the data. Finally, we reviewed the numbers of approved applications from the two data sets to confirm that they were reasonably close and determined that they were.<sup>3</sup> We determined that in the case of both the FSA data and the PSLF loan servicer data, the data were reliable for our purpose of reporting the extent to which DOD personnel pursue the PSLF program.

To assess the extent to which DOD provides information about PSLF on benefits webpages and other resources such as guidebooks and fact sheets, we compiled a list of resources from interviews with DOD and service-level officials, web searches for service-level recruitment webpages, and web searches for specialty career field recruitment webpages. We counted the number of resources we reviewed as well as the number of resources that contained information about PSLF, included a link to Education's PSLF website, or contained information about DOD's student loan repayment program, or about how annual lump-sum payments from DOD's student loan repayment program could count as up to 12 qualifying payments toward PSLF. We also reviewed prior GAO reports relevant to key talent management strategies.<sup>4</sup>

We also interviewed officials from the Office of the Under Secretary of Defense for Personnel and Readiness (the office responsible for policy and planning related to the education, training, and compensation of DOD personnel), the military services, the National Guard Bureau, and other DOD components regarding their awareness of the PSLF program and the extent to which that information is conveyed to personnel. We identified a selection of offices in specialty career fields through interviews, DOD materials such as DOD recruitment webpages, and information on the usage of DOD's student loan repayment program. The specialty career fields we identified included engineers, nurses, contracting and acquisition professionals, judge advocates, information technology specialists, chaplains, musicians, and finance professionals. We selected these specialty career fields using the following criteria: (1)

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<sup>3</sup>According to one official, the numbers between the two data sets do not match completely because of a time lag between when the PSLF loan servicer approves an application and when FSA processes it.

<sup>4</sup>GAO, *Federal Workforce: Key Talent Management Strategies for Agencies to Better Meet Their Missions*, [GAO-19-181](#) (Washington, D.C.: Mar. 28, 2019).

DOD and service-level officials mentioned the specialty career field during an interview; (2) DOD offers its student loan repayment program to personnel within the specialty career field and the particular specialty career field takes advantage of the student loan repayment program at a higher percentage than other specialty career fields, as evidenced in available reports and data; and (3) DOD service webpages list the specialty career field as a high-demand career.

To address our second objective, we reviewed laws, regulations, and documents related to Education's administration of the PSLF program and the provision related to DOD's student loan repayment program. We interviewed Education and DOD officials about efforts to share PSLF-related information and the availability of PSLF-related information to DOD personnel. We also interviewed officials from Education, DOD, the Office of Personnel Management, and the Consumer Financial Protection Bureau about how the agencies have shared information about PSLF with each other and DOD personnel.

We collected and assessed evidence against DOD guidance, FSA's most recent strategic plan, and our prior work on leading practices of high-performing organizations.<sup>5</sup> Additionally, we collected and assessed evidence against our prior work relevant to interagency collaboration strategies and DOD's guidance on its student loan repayment program.<sup>6</sup> We also reviewed *Standards for Internal Control in the Federal Government*, assessed our evidence against the standards, and determined that standards on the use and communication of quality information were significant to this objective. Specifically, we used the standards that state that agencies should communicate the necessary

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<sup>5</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). Department of Education, Federal Student Aid, *Strategic Plan FY 2015-19* (Washington, D.C.: November 2015, updated November 2016). This was the most recent strategic plan available from the office at the time of our review. Education has since released its strategic plan for fiscal years 2020-24, which includes similar goals to the ones that we used to evaluate the department's efforts.

<sup>6</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). DOD Instruction 1304.36, *Education Loan Repayment Program* (Sept. 12, 2018). DOD Instruction 1400.25, vol. 537, *DOD Civilian Personnel Management System: Student Loan Repayment* (May 7, 2020).

quality information to those who need it to achieve agency goals.<sup>7</sup> We also reviewed laws, regulations, and documents related to the PSLF program. We reviewed resources that contained information about how annual lump-sum payments from DOD's student loan repayment program could count as up to 12 qualifying payments toward the program.

We interviewed Education officials to assess the extent to which they collaborated and shared information with DOD about the PSLF program, including information about how annual lump-sum payments from DOD's student loan repayment program could count as up to 12 qualifying payments toward the PSLF program. We asked about the extent to which Education has worked with DOD on campaigns to share information about the program with DOD personnel and what processes Education has in place to share information about the PSLF program with DOD officials and DOD personnel. We also interviewed officials from the Office of Personnel Management and the Consumer Financial Protection Bureau about information available on the PSLF program and relevant interaction between DOD and Education officials.

To address our third objective, we interviewed officials from DOD and the military services regarding the use of the PSLF program for recruitment and retention to promote readiness. We also reviewed our past reports on DOD recruitment and retention to support readiness.

To assess the extent to which DOD provides information about the PSLF program on recruitment, retention, and readiness webpages, we compiled a list of resources from interviews with DOD and service-level officials, web searches for service-level recruitment webpages, and web searches for specialty career field recruitment webpages. We counted the number of resources we reviewed, the number of resources that contained information about the PSLF program, the number of resources that included a link to Education's PSLF website, the number of resources that contained information about DOD's student loan repayment program, and the number of resources that contained information about how annual lump-sum payments from DOD's student loan repayment program could count as up to 12 qualifying payments toward the PSLF program. We

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<sup>7</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

reviewed our prior reports on hiring, recruitment, and retention.<sup>8</sup> We also reviewed DOD's current civilian human capital operating plan and national defense business operations plan.<sup>9</sup>

We gathered information from interviews and written responses from DOD officials, service-level officials, and specialty career field officials (as described in the prior section) on recruitment, retention, and readiness and how the PSLF program affects these efforts. Our interviews included, among others, DOD and service officials in offices that address military and civilian employee matters, DOD's student loan repayment program, financial readiness, and voluntary education programs.

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<sup>8</sup>GAO, *Defense Health Care: DOD Should Collect and Use Key Information to Make Decisions about Incentives for Physicians and Dentists*, [GAO-20-165](#) (Washington, D.C.: Jan. 15, 2020); *Human Capital: Improving Federal Recruiting and Hiring Efforts*, [GAO-19-696T](#) (Washington, D.C.: July 30, 2019); and *DOD Personnel: Further Actions Needed to Strengthen Oversight and Coordination of Defense Laboratories' Hiring Efforts*, [GAO-18-417](#) (Washington, D.C.: May 30, 2018).

<sup>9</sup>Department of Defense, *FY 2020 - FY 2021 Department Of Defense Civilian Human Capital Operating Plan* (October 2019); and *FY 2018 – FY 2022 National Defense Business Operations Appendices* (Washington, D.C.: May 2018).

# Appendix II: GAO Recommendations to the Department of Education on Public Service Loan Forgiveness

**Table 3: Status of GAO Recommendations to the Department of Education on the Public Service Loan Forgiveness (PSLF) Program and its Temporary Expanded Public Service Loan Forgiveness (TEPSLF) Option**

GAO recommendation to the Department of Education	Recommendation status
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. ( <a href="#">GAO-18-547</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.
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. ( <a href="#">GAO-18-547</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.
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. ( <a href="#">GAO-18-547</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.
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. ( <a href="#">GAO-18-547</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.
Integrate the TEPSLF request into the PSLF application by, for example by including a checkbox on the PSLF application to provide borrowers a more seamless way to request TEPSLF consideration. ( <a href="#">GAO-19-595</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.
Provide certain borrowers, for example those who are denied TEPSLF for not having 120 qualifying payments, with more information about options available to contest TEPSLF decisions on the TEPSLF website and in their denial letters. ( <a href="#">GAO-19-595</a> )	<b>Not Addressed:</b> The agency has planned but not yet taken actions to implement this recommendation.
Require all loan servicers to provide TEPSLF information on their websites. ( <a href="#">GAO-19-595</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.
Include TEPSLF information in Education’s PSLF Online Help Tool. ( <a href="#">GAO-19-595</a> )	<b>Addressed:</b> The agency has taken actions to fully implement this recommendation.

Source: GAO. | GAO-21-65

Note: The status of these recommendations is current as of the publication of this report. For updates, please see [GAO-18-547](#) and [GAO-19-595](#). GAO, *Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers*, [GAO-18-547](#) (Washington, D.C.: Sept. 5, 2018); and *Public Service Loan Forgiveness: Improving the Temporary Expanded Process Could Help Reduce Borrower Confusion*, [GAO-19-595](#) (Washington, D.C.: Sept. 5, 2019).

# Appendix III: Comments from the Department of Defense



MANPOWER AND  
RESERVE AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE  
1500 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-1500

3/8/2021

Ms. Tina Won Sherman  
Acting Director, Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, NW  
Washington DC 20548

Dear Ms. Sherman,

This is the Department of Defense (DoD) response to the GAO Draft Report, GAO-21-65, "PUBLIC SERVICE LOAN FORGIVENESS: DoD and Its Personnel Could Benefit from Additional Program Information", dated January 29, 2021 (GAO Code 103817).

Enclosed is the Department's response to the subject draft report. My point of contact is Steven Wood, who can be reached via email at [steven.w.wood16.civ@mail.mil](mailto:steven.w.wood16.civ@mail.mil), and by phone at 703-571-7203. He will be able to direct any inquiries to the appropriate subject matter expert.

Sincerely,

HEBERT.LERNE Digitally signed by  
HEBERT.LERNES.J.1121185934  
Date: 2021.03.08 17:27:35  
-0500  
S.J.1121185934

Lernes J, Hebert  
Performing the Duties of the Assistant Secretary  
of Defense for Manpower and Reserve Affairs

Enclosure:  
As stated.

GAO DRAFT REPORT DATED JANUARY 29, 2021  
GAO-21-65 (GAO CODE 103817)

“PUBLIC SERVICE LOAN FORGIVENESS: DOD AND ITS PERSONNEL COULD  
BENEFIT FROM ADDITIONAL PROGRAM INFORMATION”

DEPARTMENT OF DEFENSE COMMENTS  
TO THE GAO RECOMMENDATION

**RECOMMENDATION 1:** The GAO recommends that the Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness shares additional information about the PSLF program, including its eligibility requirements and application process, with DOD military and civilian personnel. For example, DoD could update its benefits webpages to include details on the program’s eligibility requirements and application process.

**DoD RESPONSE:** Partially concur. The Office of Financial Readiness previously developed and fielded some educational products about the PSLF program for active duty Service members. However, as the PSLF is a Department of Education program, DoD efforts focus on education and a general understanding of the PSLF program by ensuring personnel know where to seek further information from the Department of Education with regards to detailed information on the application processes. This ensures personnel access the most current and accurate information from the agency responsible for administering the program.

**RECOMMENDATION 3:** The GAO recommends that the Secretary of Defense should ensure that the Office of the Under Secretary of Defense for Personnel and Readiness collaborates with officials in Education’s Office of Federal Student Aid to disseminate information about the PSLF program, including current information on program participation and eligibility as well as PSLF program requirements, including the potential to pursue PSLF and DOD’s student loan repayment. For example, DOD and Education could use interagency groups or agreements to help improve information sharing among department officials and with military and civilian personnel.

**DoD RESPONSE:** Partially Concur. While DoD is committed to ensuring military and civilian personnel can access accurate PSLF program information, the Department of Education is primarily responsible for disseminating information about the PSLF program, including current information on program participation and eligibility as well as PSLF program requirements. The DoD will continue to work with Department of Education personnel on this line of effort.

**RECOMMENDATION 5:** The GAO recommends that the Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness issues guidance to DOD and military service officials, such as front-line managers and human resources employees, on how the PSLF program could be used as a tool for recruitment and retention to promote readiness.

**DoD RESPONSE:** Partially Concur. The Department does not believe this is an effective military recruitment tool for most DOD programs where applicants do not typically have substantial student loan debt. For those DOD programs where students have substantial loan debt, like the service Judge Advocate General’s Corps, as noted on page 27 of the report, the programs rely on PSLF as a recruitment and retention tool and do provide

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**Appendix III: Comments from the Department  
of Defense**

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information to PSLF applicants. The Department strongly supports and encourages continued availability of PSLF for these programs. Otherwise, most military recruits seek immediate monetary bonuses or near-term loan repayment incentives as motivation for joining. The Department believes the effectiveness of the PSLF program as a retention tool is limited due to the 10 years of payments necessary to qualify for the program's loan forgiveness benefit. The Department will ensure DOD and Military Department officials know where to direct Service members and civilian employees to obtain information on the PSLF program.

# Appendix IV: Comments from the Department of Education



February 26, 2021

Ms. Melissa Emrey-Arras  
Director, Education, Workforce, and Income Security Issues  
Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Emrey-Arras:

I am pleased to write on behalf of the U.S. Department of Education (Department) in response to the recommendations made in the Government Accountability Office (GAO) draft report, *Public Service Loan Forgiveness: DOD and Its Personnel Could Benefit from Additional Program Information (GAO-21-65)*. We appreciate the time and effort that went into this engagement and the opportunity to respond to this draft GAO report and the two specific recommendations to the Department.

The draft GAO report focuses on service member participation in the Department's Public Service Loan Forgiveness (PSLF) Program from 2007 through January 2020. Before addressing the two specific recommendations in the draft GAO report relating to the Department, we believe it is important to note that the Department's office of Federal Student Aid (FSA) has made improvements to its administration of the PSLF Program since January 2020. Those improvements include steps such as enhancing tools and resources to directly address borrower confusion on program requirements, providing clarity on processes, and increasing transparency on a borrower's progress towards meeting the conditions required to receive loan forgiveness.

But we plan to go further in the future. Federal Student Aid is collaborating with offices in the Department charged with postsecondary education policy to review the overall status of the PSLF Program to identify further opportunities for improvements. This review includes exploring options to provide clearer information—especially for those with applications deemed ineligible—as well as ease or automate the application process, including through collaboration with other federal agencies.

FSA's recent improvements to PSLF better support service members seeking PSLF. Below is an overview of the improvements made by the Department throughout 2020.

In June 2020, FSA established an employer eligibility database within the PSLF Help Tool which provides borrowers the ability to search employers and immediately see the employer's status as eligible, ineligible, or likely ineligible for PSLF. Currently, there is information on more than 2.7 million employers contained within the database, an increase of approximately 1 million employers since the database was initially launched. FSA also improved borrowers' access to

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information on their progress towards qualifying for PSLF by adding the number of qualifying payments made by the borrower, to date, to the *Aid Summary* display when a borrower is logged into StudentAid.gov.

In August 2020, FSA implemented a policy update made by the Department to allow lump sum payments to count towards PSLF for prospective months, provided that employment certification and other requirements are met. FSA also made improvements to customer communications and the information available through the PSLF Servicer's online borrower portal providing greater transparency and detail on a borrower's progress towards meeting the program's requirement for 120 qualifying payments. For example, the PSLF Servicer's portal now gives a borrower more insight into his or her account on *eligible* monthly payments under the PSLF Program, which are on-time payments made in the amount due on a qualifying repayment plan. Additionally, the borrower can see the number of *qualifying* monthly payments, which are eligible payments with employment certification. A borrower is also now provided information regarding why a payment did not meet the required criteria to be considered eligible, qualifying, or both (e.g., the payment was not made for the full amount due, it was late, or the borrower has yet to submit employment certification covering that month).

Additionally, the Department's PSLF Servicer made updates to its system in August to automate the counting of PSLF months for borrowers who are on administrative forbearance pursuant to the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Department's extensions of that benefit, since periods of forbearance are not generally eligible for PSLF under non-CARES Act conditions. As a result, the borrower's online account information displays these months under CARES Act administrative forbearance as eligible, and upon employment certification, the months are updated to a qualifying status towards the requirement for forgiveness.

In November 2020, FSA integrated the Temporary Expanded PSLF (TEPSLF) Program into the PSLF Help Tool, which previously only included steps for borrowers to certify employment or apply for PSLF. Concurrently, FSA introduced the combined *Public Service Loan Forgiveness (PSLF) and Temporary Expanded PSLF (TEPSLF) Certification & Application* (PSLF form) on both StudentAid.gov and through the PSLF Help Tool. Now, once a borrower submits the combined PSLF form, the PSLF Servicer conducts a comprehensive review of the borrower's eligibility for both PSLF and TEPSLF. If the borrower has not yet met all the requirements, the form serves as employment certification for the time periods the borrower submitted employment information. This information is also made available to the borrower through the Servicer's online borrower portal to provide greater transparency into the borrower's progress on the number of eligible and qualifying payment counts for both PSLF and TEPSLF.

Another component of the November 2020 release included a back end customer relationship management system for employer eligibility decisions. Although this system is not visible to the borrower, it creates internal efficiencies that ultimately result in a better customer experience by storing the documentation and information used to make the employer decision, which is fed into the employer eligibility database within the PSLF Help Tool.

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Finally, the November 2020 release re-platformed the PSLF Help Tool, using best practices and user-tested design principles to deliver an improved customer experience. As the borrower completes the steps of the tool, the borrower will now see features such as “My Loan Eligibility,” which shows a customized breakdown of the borrower’s loans, a summary of the current steps the borrower has taken to that point, and other personalized information. Borrowers are also provided recommended and required actions to inform their next steps. For example, a borrower who has loans under the Federal Family Education Loan Program (FFELP) receives messaging indicating that only Direct Loans are eligible for PSLF, as well as information on loan consolidation.

These improvements made to PSLF processes and systems in 2020 were implemented to directly address the difficulties experienced by borrowers; they improve the clarity of information about the program’s requirements and lessen the confusion about borrowers’ progress towards making qualifying payments. As cited in the draft GAO report, which included information and data through January 2020, the top three reasons service members were not yet eligible for forgiveness include the lack of qualifying payments, missing information, and ineligible loan types. These three categories are consistent with all borrower eligibility for PSLF. The primary reason that borrowers, including service members, are not yet eligible for PSLF is that they have not met the statutory requirement of 120 qualifying payments. In fact, of all borrowers who submitted an ineligible PSLF application, about 80 percent did not have a Direct Loan that entered repayment at least 10 years ago, though some of these borrowers may have been in repayment in the FFEL Program for that period of time. Confusion over the interplay between having FFEL loans and PSLF eligibility will be a component of the policy-focused review discussed above. As described earlier, the Department’s systems now will provide a borrower with greater insight as to the number of qualifying payments reflected in his or her account provided submission of a PSLF form to certify periods of employment.

In its draft report, GAO also raises the issue of borrowers whose employment certification forms (ECFs) are not accepted by the Department. In most cases, an ECF is not accepted because required information is missing from the form. As the draft GAO report notes, the missing information includes required fields such as missing signatures, the employer’s federal EIN, or the borrower’s starting and ending employment dates. With the improvements made to the PSLF Help Tool, there should be fewer instances of borrowers leaving blank fields on the PSLF form. FSA continues to work towards the goal of providing borrowers with a fully digital application process, including digital signature and submission options.

With the significant number of improvements delivered in 2020, we believe FSA has addressed seven of the eight recommendations made in GAO’s prior reports on PSLF, GAO-18-547 and GAO-19-595. Along with the steps described above, the Department completed an initial *PSLF Servicing Guide* in March 2020 to provide guidelines to the PSLF Servicer on overall requirements and servicing standards for the PSLF Program. The guide consists of updates to general business practices as provided by change requests for both operational and system enhancements to the program. FSA will continue to make periodic updates to the guide as determined by new program guidelines and initiatives. FSA is in the process of addressing Recommendation 2 for GAO-19-595 on providing borrowers with more information to contest TEPSLF decisions and expects the work to be complete later in spring 2021.

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Additionally, FSA is exploring opportunities to better leverage the active-duty service member data that loan servicers currently collect on student loan borrowers from the Department of Defense's (DOD) Servicemember Civil Relief Act (SCRA) database, to improve PSLF outreach and possibly supplement and or automate the employer certification process. FSA hopes to engage the Office of Personnel Management to explore the possibility of automating the employer certification for all federal employees, who currently account for approximately half of all PSLF applicants.

Before addressing GAO's remaining recommendations in this draft report, we need to clarify and add more detail to one point in the draft GAO report. GAO's draft report states, "as of January 23, 2020, there were 176,906 active-duty service members with federal loans eligible for the PSLF Program, according to Education data." That number represents all active-duty service members with any federal student loans, not just Direct Loans. For example, of the 183,340 active-duty service members with any federal student loans as of February 17, 2021, 178,215 borrowers have loans in the Direct Loan Program and, thus, may be eligible for PSLF or TEPSLF. Another 16,195 borrowers have FFEL loans or Perkins Loans and would not otherwise be eligible if they did not consolidate their loans. Approximately 11,000 service members have both Direct Loans and non-Direct Loans. This split between borrowers with eligible loans and non-eligible loans highlights the continued need to assist borrowers in understanding how to qualify for PSLF.

We hope these efforts are taken into consideration as ways FSA has improved the experience for borrowers working towards PSLF. On behalf of the Department, please find the responses to the two recommendations directed to the Secretary of Education. The other three recommendations in the draft GAO report are addressed to DOD.

**Recommendation 2: The Secretary of Education should ensure that the Chief Operating Officer of the Office of Federal Student Aid collaborates with officials in the Office of the Under Secretary of Defense for Personnel and Readiness to share information about the PSLF program, including current information on program participation and eligibility as well as PSLF program requirements, including the potential to pursue PSLF and DOD's student loan repayment. For example, Education and DOD could use interagency groups or agreements to help improve information sharing among department officials and with military and civilian personnel.**

Response: The Department concurs with the recommendation for FSA to collaborate with DOD's Office of the Under Secretary of Defense for Personnel and Readiness to share information on the available tools and resources for service member borrowers interested in PSLF and has already begun this collaboration with DOD. FSA had already begun discussions with DOD about enhancements to our digital toolsets and is actively working with DOD on providing more and improved information to employees interested in PSLF. As indicated above, FSA made enhancements to the PSLF Help Tool to assist borrowers in better understanding the eligibility requirements for PSLF and TEPSLF, the actions required from the borrower, and the steps the borrower must take to receive loan forgiveness. In addition, the Department has previously collaborated with DOD on improved handling of lump sum payments made by DOD

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on qualifying student loans under its student loan repayment program and how to apply the funds for multiple PSLF qualifying months. We appreciate the opportunity to engage with DOD and to highlight features for borrowers, such as the employer database, improved user steps in the tool, and the combined PSLF form, along with the information on StudentAid.gov specifically for service members interested in PSLF.

**Recommendation 4: The Secretary of Education should ensure that the Chief Operating Officer of the Office of Federal Student Aid updates the student loan guide for service members to provide information on applying for the PSLF program and its temporary expanded process as well as the steps borrowers can take to count their annual payment from DOD's student loan repayment program as multiple qualifying payments for the PSLF program.**

Response: We concur with this recommendation. As noted above, with the implementation of the combined PSLF form, there is no longer a separate process for a borrower to be considered for TEPSLF. Once a borrower completes and submits the PSLF form, the PSLF Servicer conducts a comprehensive review of the borrower's eligibility for both PSLF and TEPSLF. We agree that updates to reflect the combined PSLF form should be made in the next version of the student loan guide for service members.

Separately, FSA currently makes information available on lump sum payments made by DOD for service members through StudentAid.gov, and we agree this information should be included in the next version of the student loan guide for service members, with the understanding that resources and funding are necessary to support these changes and inform the timing of the next update. FSA will work with DOD to ensure there are clear instructions for borrowers participating in DOD's student loan repayment program to earn qualifying payments for the PSLF Program.

Again, we thank you for the opportunity to review the draft GAO report and provide feedback for your consideration.

Sincerely,

*Mark A. Brown*

Mark A. Brown  
Chief Operating Officer  
Federal Student Aid

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# Appendix V: GAO Contacts and Staff Acknowledgments

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## Staff Acknowledgments

In addition to the contacts named above, Vincent Balloon and William Colvin (Assistant Directors), Rebekah J. Boone (Analyst in Charge), Karen Chen, and Michael Naretta made key contributions to this report. Also contributing to this report were David L. Jones, Carl Nadler, Monica Savoy, Michael Shaughnessy, John Van Schaik, and Lillian M. Yob.

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