

PSLF Waiver 2.0: Get a Second Chance with the IDR Recount

RAIN General Meeting

1/19/23

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Stephanie Sampedro, Student Loan Advocate



Washington Student Loan Advocate

Student debt in Washington

780,000+
student loan
borrowers

\$28.2 billion outstanding student debt

\$35,740 average student debt

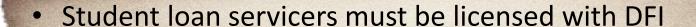
98,214 borrowers in delinquency

\$2.4 billion in delinquency

36% increase in senior citizens w/debt



Washington Student Loan Bill of Rights



- Schools must notify student borrowers about Student Loan Advocate
- Develop student borrower education course
- Borrowers may request information or resources or make a complaint to Advocate
- Advocate makes recommendations to legislature regarding student debt in Washington



https://lawfilesext.leg.wa.gov/biennium/2017-18/Pdf/Bills/Session%20Laws/Senate/6029-S2.SL.pdf

New WA state legislation



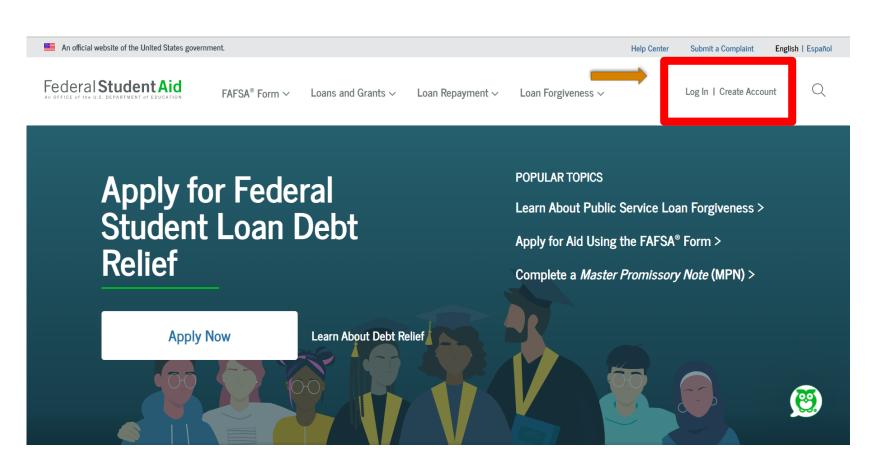
• SB 5847 requires:

- The Office of the SLA to create materials to increase awareness of the PSLF program
 - A standardized letter for public employees
 - A detailed fact sheet
 - An FAQ sheet
- The development of a program for state agencies to certify employment for PSLF
- Develop statewide initiative to improve access and remove barriers to PSLF
- This information will be provided:
 - All employees annually
 - Newly hired employees within 30 days of starting
 - When employees leave their jobs

Washington Student Loan Advocate

Federal Student Aid (FSA) ID

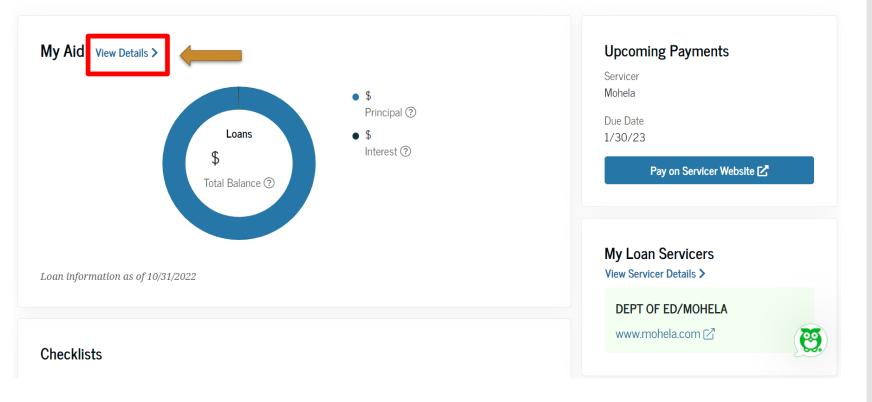




www.studentaid.gov

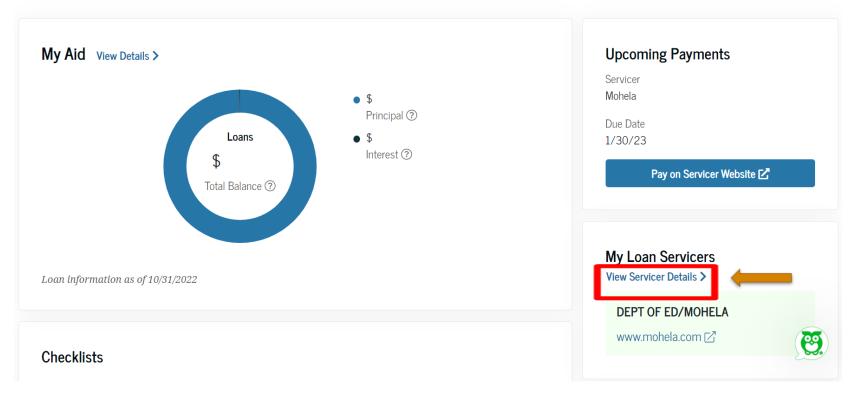
View your loan details

Dashboard



Find your loan servicer information

Dashboard







Great Lakes Educational Loan Services

Hesc/EdFinancial

MOHELA

Aidvantage

Nelnet

OSLA Servicing

Heartland ECSI





Great Lakes
Educational Loan
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(Normal) Public Service Loan Forgiveness (PSLF) Eligibility

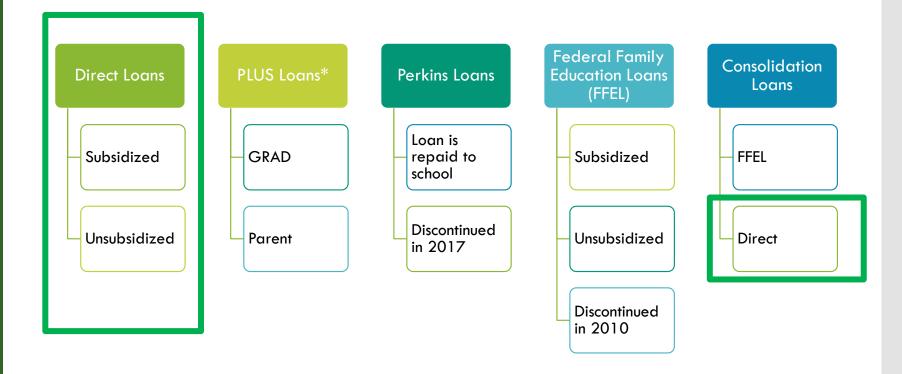
Overview



- Right type of loans
- 2 Right type of repayment plan
- 3 Right type of employment
- 4 Right number of payments



Eligible federal student loans







Choose an eligible repayment plan



Repayment Plan		Repayment Period	Monthly Payment Initial to Final Amounts				Projected Loan Forgiveness	Total Interest	Total Amount Paid
Standard+	0	120 months	\$2,220	to	\$2,220		\$0	\$66,449	\$266,449
Graduated+	0	120 months	\$1,270	to	\$3,809		\$0	\$84,240	\$284,240
Extended Fixed	0	300 months	\$1,289	to	\$1,289		\$0	\$186,581	\$386,581
Extended Graduated	0	300 months	\$1,000	to	\$1,940		\$0	\$220,577	\$420,577
Pay As You Earn↔	0	240 months	\$470	to	\$1,320	_~~	\$240,844	\$199,156	\$199,156
Income-Based Repayment (IBR)	0	300 months	\$705	to	\$2,220	~~~	\$21,221	\$251,387	\$430,167
Income-Contingent Repayment (ICR)++	0	205 months	\$1,071	to	\$2,470	_~~	\$0	\$144,769	\$344,769

https://studentaid.gov/loan-simulator/

Repayment plans (not incomedependent)



Plan	Terms	Repayment Period	Forgiveness?
Standard	60-120 equal payments	Up to 10 years	None
30-year Standard	360 equal payments	Up to 30 years	None
Graduated	Payment grows every 2 years	Up to 10 years	None
Extended Fixed	300 equal payments	Up to 25 years	None
Extended Graduated	Payment grows every 2 years	Up to 25 years	None

Income-Driven Repayment (IDR) plans



Plan	Payment no more than	Forgiveness after			
Income Based Repayment (IBR)	15% of discretionary income	About 25 years			
IBR for New Borrowers	10% of discretionary income	About 20 years			
Pay As You Earn (PAYE)	10% of discretionary income	About 20 years			
Revised Pay As You Earn (REPAYE)	10% of discretionary income	20-25 years			
Income Contingent Repayment (ICR)	20% of discretionary income	25 years			
HH of 1 in $WA = $21,870 (2023)$					



Employment



Full time

30 hours/week

or "FT" by employer definition

part-time public service jobs = 30 hours+

Public employer(s)

Any level of government

501c3 organization

Employer more important than role

Must be employed when apply & forgiveness granted

*Org with another tax status (501c4)

Military service
Public health services
Public education

Public library services

Early childhood ed.

Public interest law Disability services

No labor unions or partisan political orgs



Make 120 qualifying payments



- All 120 payments must be:
 - On-time
 - Full
 - Scheduled
 - Made after October 1, 2007
 - Made via a qualifying repayment plan
- All payments **are not** required to be:
 - Made consecutively
 - Made with one student loan servicer
 - Made with one employer

Employer certification





PUBLIC SERVICE LOAN FORGIVENESS (PSLF) & TEMPORARY EXPANDED PSLF (TEPSLF) CERTIFICATION & APPLICATION

William D. Ford Federal Direct Loan (Direct Loan) Program

OMB No. 1845-0110 Form Approved Exp. Date 08/31/2023 PSFAP - XBCR

WARNING: Any person who knowingly makes a false statement or misrepresentation on this form or on any accompanying document is subject to penalties that may include fines, imprisonment, or both, under the U.S. Criminal Code and 20 U.S.C. 1097.

- New form (known as "PSLF Form") created in 2020 combines:
 - Employment certification for PSLF, TEPSLF and application for forgiveness for both programs
- One form for all processes eliminates confusion
- Recommend submitting every year to certify employment, evaluate eligibility and number of qualifying payments
 - Use <u>PSLF Help Tool</u> to generate form(s)
 - Sign & collect employer(s)'s signatures
 - Submit to MOHELA instructions on form
- Once form submitted and eligibility determined, loans are transferred to MOHELA if they're not your current servicer
 - Transfer can take up to 90 days

Record keeping is key



- While the servicer should keep detailed records, it is also crucial for the borrower to as well
 - Especially from servicers other than MOHELA
- Keep records of payments, employment certification, and all correspondence with MOHELA
- Yearly certification of employment will help address issues early on
- If you call and speak with a representative, get all employment ID numbers and note the date & time of your call
 - The more communication in writing, the better!

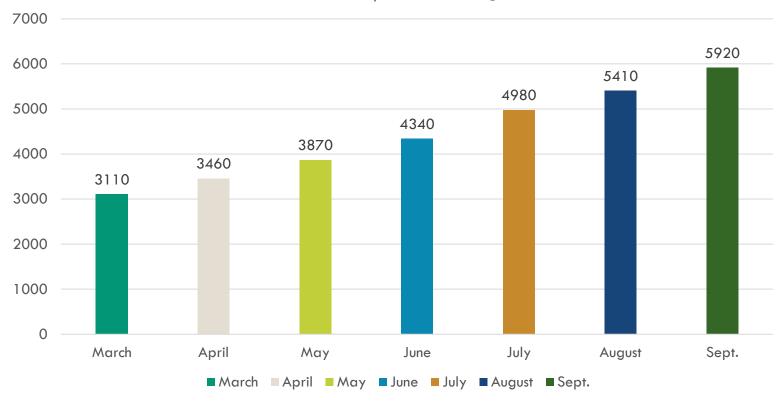
PSLF Waiver ended on 10/31/2022



- Special period where ED waived many rules around what counts as a qualifying payment
 - Repayment on all loan types (except Parent PLUS) counted
 - Repayment on loans before consolidation counted
 - Could have received forgiveness if no longer employed
 - Teacher Loan Forgiveness (TFL) & PSLF periods could overlap

PSLF waiver outcomes in WA (2022)

Borrowers w/ Loans Forgiven

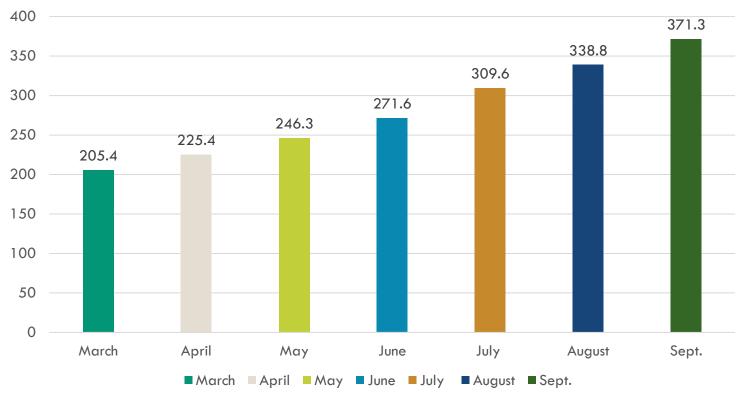


https://studentaid.gov/data-center/student/loan-forgiveness/pslf-data

PSLF waiver outcomes in WA (2022)







https://studentaid.gov/data-center/student/loan-forgiveness/pslf-data

IDR One-Time Adjustment & PSLF Waiver 2.0

Commercial loans must consolidate by May 1st

Deferment vs. Forbearance

Deferment

- Temporary suspension of payments
- Interest on unsub loans accrues

Forbearance

- No progress towards forgiveness
- Temporary reduction or postponement of payments
- Interest on all loans accrues



IDR one-time adjustment period

- Aims to correct for borrowers who were steered into forbearance/deferment unnecessarily
- Certain periods of forbearance and/or deferment will convert to IDR payments for borrowers with:
 - 12 or more consecutive months of forbearance
 - 36 or more of total months of forbearance
 - Months spent in economic hardship or military deferments after 2013
 - Periods of deferment before 2013 (excluding in-school)
- Borrowers with commercial FFEL & Perkins loans will need to consolidate before May 1st
 - Automatic for borrowers with all other federally-held loans
- Loans will start to be forgiven this spring



IDR Adjustment & PSLF Waiver 2.0

- New IDR payments will be eligible for PSLF
 - Borrower will need to certify employment for these new payments
 - This would lead to forgiveness after 120 payments, instead of 240/300.
- Parent PLUS loans are eligible for IDR Adjustment & to receive PSLF credit!
- Many of last year's waiver rules apply, except:
 - Must still be employed
 - TFL period can't overlap with PSLF
 - Parent PLUS are now eligible!



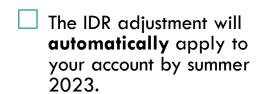
IDR Adjustment & PSLF Waiver 2.0



- 1 Right type of loans
- 2 Right type of repayment plan
- 3 Right type of employment
- 4 Right number of "payments"

Do I need to act to take advantage of the IDR Adjustment?

I have only Direct Loans, have been paying all loans for the same amount of time, and have certified and received approval on my PSLF form(s) in the last 12 months I have only Direct loans, have been paying all loans for the same amount of time, but have not submitted a PSLF form in the last 12 months I have Parent Plus Loans, non-Direct loans (like FFEL & Perkins), or you have been paying some of your loans for a longer period of time than others



Submit PSLF Form(s) to make sure your qualifying payment counts are updated to reflect any new IDR-eligible payments.

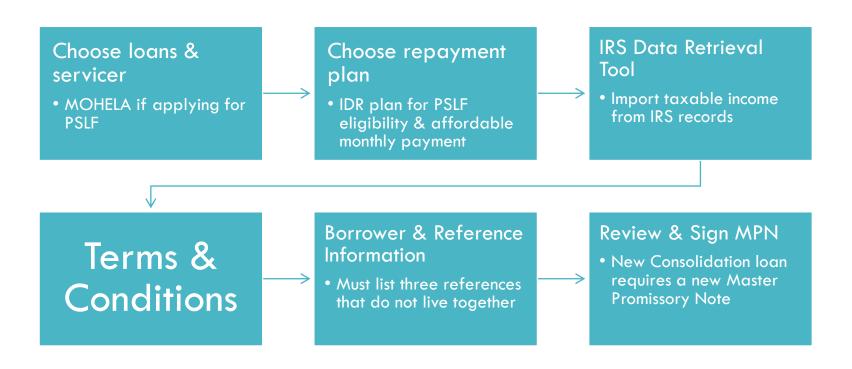
Apply for a Direct
Consolidation Loan by
May 1,2023 to get the
full benefits of the IDR
recount

Submit <u>PSLF Form(s)</u> for all qualifying employees (no specific deadline, but as soon as possible).



Direct consolidation in 6 steps





Use the <u>Steps to Apply for PSLF</u> prior to applying for Consolidation!

Things are changing!



- Major servicer transfers
 - FedLoan Servicing (PHEAA) → MOHELA
 - Navient → Aidvantage
- Payment pause will end sometime in 2023
 - 60 days after the debt relief litigation is resolved
 - OR 60 days after June 30th
- One-time relief Supreme Court case in February
- IDR One-Time Account Adjustment (by July 2023)
- "Fresh Start" is in effect
- New regulations in effect July 1st,2023 including new PSLF rules
- Proposed new 5% new IDR Plan (tentatively by the end of 2023)

Upcoming webinars



Upcoming Webinars

PSLF Waiver 2.0: Get a Second Chance with the IDR Recount

Have you sought to apply for the Public Service Loan Forgiveness (PSLF) program, but have more questions than answers? Have you heard about the PSLF Limited Waiver Opportunity but think you missed the deadline? Do you have Parent Loan for Undergraduate Students (Parent PLUS) loans and think you don't qualify? In this webinar, you will learn how to get many of the benefits and more from the waiver under the upcoming Income-Driven Repayment (IDR) Account Adjustment:



- Get PSLF credit for previous payments made under PSLF ineligible repayment plans or loan types, including Parent PLUS loans!
- Get PSLF credit for certain periods of forbearance and/or deferment.
- Get automatic discharge if you have been in repayment for 20-25 years, even if you don't qualify for PSLF.

Take advantage of the IDR Recount before it ends on May 1! We'll provide time for questions and links to resources so you can take the next steps and navigate your way through the process. Register today and we look forward to seeing you online soon!

Presenters: Jessica M. Manfredi, PSLF Program Associate and Stephanie Sampedro, Washington Student Loan Advocate

Dates & Registration:

- Tuesday, Feb. 7, @ 12:00 p.m.
- Wednesday, Feb. 22 @ 12:00 p.m.

If you are not able to attend one of the webinars, we will soon post a recording of the presentation, the presentation slides and transcript.

https://wsac.wa.gov/loan-advocacy https://wsac.wa.gov/PSLF

Resources



Steps to Apply for PSLF:

- https://tinyurl.com/PSLFsteps
- Step by step instructions on how to apply for PSLF

PSLF Help Tool:

- https://studentaid.gov/pslf/
 - Will need
 - ☐your employer's tax Employer ID (EIN)
 - □ dates of employment at your employer(s)
 - Does not yet allow you nor your employer to sign the form within the tool

PSLF FAQs:

- https://studentaid.gov/manage-loans/forgivenesscancellation/public-service/questions
- We will be publishing our own, detailed version soon!



Let us know how we're doing!

Please fill out a survey and help us continue providing resources for WA student borrowers.

Questions?

Complete our complaint/questions form to get assistance from us!

https://www.studentcomplaints.wa.gov/

Make sure to select "Student Loan Issues Form"!

