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The National Association for the Education of Young Children (NAEYC) appreciates the opportunity to provide feedback in response to the Department of Education's request for comments on the administration and operations of the Public Service Loan Forgiveness Program (PSLF). We are providing comment on the areas in which there are substantial, meaningful connections between higher education and early childhood education, as research has made it clear that there is no path to high-quality early childhood education (ECE) without high-quality early childhood educators, and the Department of Education has an important role to play in advancing this connection.

For more than 90 years, and with more than 60,000 members, including early childhood educators, faculty members, students, advocates, and allies across the country, NAEYC's mission has been to increase access to high-quality, developmentally-appropriate early childhood education for all children birth through age 8. We advance a diverse, dynamic early childhood profession and support all who care for, educate, and work on behalf of young children. As such, and together with the 52 Affiliates who are part of our network, we appreciate the Department of Education's interest in and commitment to advancing equitable outcomes for all students, from early childhood to higher education.

Federal postsecondary grant and loan programs, including PSLF, are critical to achieving equitable outcomes, supporting current early childhood educators, strengthening the ECE workforce pipeline, and achieving the vision for a profession that benefits children, families, and our society at large. In the context of this opportunity, we urge the U.S. Department of Education staff to revise and strengthen the regulations and administration of the Public Service Loan Forgiveness Program to ensure that all students, including current and prospective early childhood educators working with children beginning at birth and in all settings, including family child care, center-based child care, and schools, equitably gain the maximum benefit from the program.

Skilled, supported, and knowledgeable early childhood educators provide high-quality early childhood education and set our nation's young children (birth through age 8) on a path to success. Their average wage of \$10.60/hour (in birth through age five settings), however, undermines quality and diminishes the benefits to children, families, and our economy. Given the complex skills and knowledge required to effectively support young children's development and education, NAEYC is working closely with national and state early childhood organizations, agencies, advocates, and the field to establish a unified, defined and recognized [early childhood education professional field of practice](#) to ensure that each and every child has access to high quality early learning and care and is supported by a well-prepared, diverse, effective, equitable, and well-compensated workforce.

While credential and degree requirements in early childhood education currently vary based on state and setting, many educators working across settings have completed college coursework, acquired

credentials, and attained degrees, including associate, baccalaureate, and master's degrees.<sup>1</sup> Most of these educators are already working, often full-time and often already in the ECE field; many have family responsibilities of their own; many are first-generation students; and many are English language learners. Accessible, predictable, and equitably available support is needed to help educators avoid the crushing burden of debt that interferes with their ability to join or stay in the valuable, demanding, and essential field of early childhood education.

NAEYC recently provided members of the early childhood education field with an opportunity to share their experiences and interactions with the Public Service Loan Forgiveness Program via a brief survey. The 257 responses we received, both from educators who are participating in the program as well as those who are not, informed the feedback we offer for the program, as outlined in the summaries and recommendations below:<sup>2</sup>

### Public Service & Student Debt

With early childhood educators earning wages so low that nearly half live in families needing to access public assistance, while simultaneously experiencing barriers to accessing and completing postsecondary education, supports that cover costs of attending college as well as supports like PSLF that forgive student loans are critical tools for recruiting and retaining early childhood educators. Many early childhood educators graduate from their degree programs with significant amounts of loans. For example, in our brief survey, 55% of respondents reported having \$50K or more in loans upon graduating, and 25% indicated having between \$25K-\$50K in loans. Thus, it was not surprising that 50% of the respondents who are participating in the PSLF program indicated that the existence of the program significantly influenced their decision to enter or stay in the early childhood field. Having assurance on the front end that their student loans will be forgiven on the back end can be a critical factor in early childhood educators' decisions about whether they can ultimately afford to enter and stay in the field.

### Experiences with Public Service Loan Forgiveness

Communication was a common theme that early childhood professionals raised throughout their responses to the survey, with the responses falling into two primary buckets: lack of communication

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<sup>1</sup> Whitebook, M., McLean, C., Austin, L.J.E., & Edwards, B. (2018). Early Childhood Workforce Index 2018. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley. Retrieved from <http://cscce.berkeley.edu/topic/early-childhood-workforce-index/2018/>

<sup>2</sup> This survey, distributed on social media, through newsletters, and in NAEYC's Hello! platform, is a non-representative snapshot in time of educators who were willing to provide feedback on their experiences and interactions with the PSLF. Information on the 257 respondents includes: 67% are early childhood educators or directors in birth through age eight early learning settings; 18% are faculty in institutions of higher education; 31% of respondents hold a bachelor's degree; 51% of respondents have a master's degree; 35% indicated that they are participating (or have participated in) the PSLF program; and 64% have not participated in the program.

about the existence of the program and communication challenges with the loan program servicer. For respondents who indicated that they did not participate in the program, 43% indicated that they had never heard of the PSLF program. Others indicated that the information about the program on the U.S. Department of Education's website was confusing. For those that are participating in the program, 40% learned about the program through their professional networks while only 10% of respondents learned about the program from their faculty advisor or school counselor. Many others commented that they happened to "stumble" on information about the PSLF program doing their own research. This speaks to an opportunity for PSLF to be better and more consistently promoted in high schools and institutions of higher education where students may first be considering a career in early childhood education. In addition, it speaks to opportunities for the Department to partner with national organizations and others that represent the professions of eligible employers to promote PSLF.

Respondents frequently reported that over the course of trying to access the PSLF program and/or during their participation in the program, they often received confusing and incorrect information from the loan servicer. Of those participating in the PSLF program, 48% reported receiving incorrect or confusing information from the loan servicer. This corresponds directly with many of the other challenging experiences early childhood educators and others have had with the program. These experiences included: 36% reported that their qualifying payments were miscounted; 33% found out that they were in the wrong repayment plan; 29% found out that their federal loan was ineligible; and 21% were incorrectly told they worked for an ineligible employer.

Respondents indicated that it was often well after they began participating in PSLF that they were notified about their ineligibility for the program, causing them to spend significant time and effort trying to come into compliance. In cases where they were informed they were in ineligible repayment plans or held the wrong type of federal student loan, this often meant they had to reset the clock on making the 120 monthly payments that count toward PSLF. And, in cases where they were given the wrong information about the ineligibility of their employer or loan, this often resulted in significant time on the part of the respondent to prove that they were, indeed, eligible for PSLF.

Other challenging experiences that early childhood educators have encountered with the PSLF Program include that many (35%) found it difficult to have their employers complete the annual paperwork to confirm their employment. Given the high rates of turnover in early childhood educator, many early childhood educators change jobs over the course of 10 years which means they have to explain the PSLF program to their new employers and follow up with them to ensure they complete their section of the annual certification.

Of those who did attempt to participate in the program, nearly one in five (19%) reported that their application for loan forgiveness was denied. Half of these respondents indicated that they were told their type of loan wasn't eligible. 25% did not work for an eligible employer for a period of the 10 years

in which they were making payments. Another 25% were in non-qualifying repayment plans. A small number of respondents (3) indicated that they appealed the decision. None of the appeals was successful.

These responses reflect similar experiences that NAEYC has heard from other educators in the field, including those working in child care settings, family child care settings where they are a sole provider, and schools, where recent data confirms that thousands of teachers have been rejected for federal student loan forgiveness because they could not get the government to approve their work as public service.

In summary, and in response to questions posed in this request for comment, it appears that some of the most challenging aspects that early childhood educators have experienced with PSLF include the following:

- Getting access to information about the PSLF program is difficult in high schools and institutions of higher education as well as in ECE professional settings.
- Information about the PSLF program on the Department's website is confusing and does not yet sufficiently and clearly convey the eligibility requirements for successfully applying for loan forgiveness nor yet sufficiently clarify the eligible types of early childhood education employers.
- The loan service provider provides confusing and often incorrect information to participants, with many participants finding out a few years into the program that their loan or employer does not meet the eligibility requirements

#### Opportunities to Strengthen PSLF for Borrowers Who Currently Work in Public Service

**Recommendation #1:** In many early childhood education degree programs, particularly in community colleges and non-licensure programs, the non-traditional student is the traditional student, so it is critical to ensure that the Department is strengthening the promotion of the PSLF program in ways that will reach a wide diversity of students and uncomplicate learners' understanding of the program itself. In the early childhood education field, this may include engaging school counselors and child development/family and consumer science teachers in high schools, faculty advisors and financial aid offices in institutions of higher education, and national and state organizations that represent the early childhood education field.

**Recommendation #2:** Because early childhood education is a mixed-delivery system in which settings include family child care, religious settings, public schools, public charter schools, private schools, Head Starts, for-profit companies, non-profit centers, and others, it is necessary to elevate and clarify in PSLF program materials and communications which types of child care and early learning settings qualify as eligible employers. Getting consistent determinations on eligibility has been difficult, and it is critical to make improvements in this area.

**Recommendation #3:** Because early childhood professionals reported often receiving confusing, outdated, and incorrect information about their current status in the program, we strongly recommend using Departmental oversight to increase the quality of communication from loan service providers and ensure it is provided in clear, consistent, and timely fashion.

Finally, while outside the scope of this specific call for comments and the Department's current authority to change, we note that simplifying the structure of the program would go a long way to help the Public Service Loan Forgiveness Program achieve its important, stated goals. As experienced by early childhood educators, there are too many opportunities to "go wrong" in this program, such as having the wrong kind of federal student loan, being in the wrong repayment plan, and working for the wrong kind employer. In the context of simplification, we specifically note two recommendations:

- Because of the child care market and the fact that thousands of early childhood educators are working in for-profit settings, as we recommend clarifying the extent to which eligible early childhood education employers is inclusive of for-profit employers.
- Because of the high rates of turnover in our field, we recommend reducing the number of required monthly payments before individuals can apply to have their loans forgiven. Many respondents to our survey indicated that making payments for 10 years is a very long time for those working in such a low-wage field, like early childhood education. Decreasing the number of required monthly payments will incentivize more early childhood educators to participate in the program and to enter and stay in the field.

By expanding the eligible federal student loans and repayment plans and expanding the eligible employers, particularly early childhood education employers, this will increase access to the PSLF program and support the recruitment and retainment of early childhood educators in an increasingly high-need field. We welcome questions from the Department and encourage you to reach out to NAEYC at any time.

To care about the children in our country is to care about the adults who love, support, and educate them. NAEYC appreciates the opportunity to work with and support the Department of Education in strengthening programs that strengthen the early childhood education workforce.