# June 7, 2022

# **PSLF Webinar Chat Questions**

# Applying/Qualifications/Eligibility/How-To

### **Q** Do FFELP Consolidation loans qualify?

For a limited time, you may receive credit for past periods of repayment on loans that would otherwise not qualify for PSLF. A FFELP Consolidation loan must be reconsolidated into a Direct Consolidation loan via studentaid.gov before October 31, 2022 in order to be eligible under the terms of the PSLF Limited Waiver.

Under normal PSLF Program rules, if you consolidate your loans, only qualifying payments that you make on the new Direct Consolidation Loan can be counted toward the 120 payments required for PSLF. Any payments you made on the loans before you consolidated them don't count. However, if you consolidate these loans into a Direct Loan before October 31, 2022, you may be able to receive qualifying credit for payments made on those loans through the limited PSLF waiver. Learn more.

The PSLF Help Tool will tell you whether you need to consolidate some or all of your loans.

Any loan received under the William D. Ford Federal Direct Loan (Direct Loan) Program qualifies for PSLF.

Loans from these federal student loan programs don't qualify for PSLF: the Federal Family Education Loan (FFEL) Program and the Federal Perkins Loan (Perkins Loan) Program. However, they become eligible if you consolidate them into a Direct Consolidation Loan.

Student loans from private lenders do not qualify for PSLF.

#### **Q** Are Perkins loans eligible?

For a limited time, you may receive credit for past periods of repayment on loans that would otherwise not qualify for PSLF.

A Perkins loan must be consolidated into a Direct Consolidation Loan via studentaid.gov before October 31, 2022 in order to be eligible under the terms of the PSLF Limited Waiver.

Under normal PSLF Program rules, if you consolidate your loans, only qualifying payments that you make on the new Direct Consolidation Loan can be counted toward the 120 payments required for PSLF. Any payments you made on the loans before you consolidated them don't count. However, if you consolidate these loans into a Direct Loan before October 31, 2022, you may be able to receive qualifying credit for payments made on those loans through the limited PSLF waiver. Learn more.

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Loans from these federal student loan programs don't qualify for PSLF: the Federal Family Education Loan (FFEL) Program and the Federal Perkins Loan (Perkins Loan) Program. However, they may become eligible if you consolidate them into a Direct Consolidation Loan.

Student loans from private lenders do not qualify for PSLF.

#### **Q** Does the President's Waiver extend to Perkins loans in any way?

For a limited time, you may receive credit for past periods of repayment on loans that would otherwise not qualify for PSLF.

A Perkins loan must be consolidated into a Direct Consolidation Loan via studentaid.gov before October 31, 2022 in order to be eligible under the terms of the PSLF Limited Waiver.

# **Q** I have a parent loan and have not yet made any payments because my son graduated from college in 2020. Would I qualify to apply?

Direct Parent PLUS loans are eligible for PSLF. The months during the COVID-19 student loan forbearance can count towards PSLF if a borrower certifies qualifying public service employment via the PSLF Help Tool.

Note that Parent PLUS loans are not eligible for Income-Driven Repayment plans unless they are consolidated into a Direct Consolidation Loan. After consolidation, only the Income-Contingent Repayment plan is available. For this reason, parent borrowers typically pay higher monthly payments while working towards forgiveness.

#### **Q** Are Direct Parent Plus Loans eligible for PSLF?

Direct Parent PLUS loans are eligible for PSLF. The months during the COVID-19 student loan forbearance can count towards PSLF if a borrower certifies qualifying public service employment via the PSLF Help Tool.

Note that Parent PLUS loans are not eligible for Income-Driven Repayment plans unless they are consolidated into a Direct Consolidation Loan. After consolidation, only the Income-Contingent Repayment plan is available. For this reason, parent borrowers typically pay higher monthly payments while working towards forgiveness.

# Q Is there an income component? Meaning, in order to seek forgiveness, you must make less than xx.xx? Does this apply to direct unsub Stafford and direct sub Stafford? direct unsub consolidation?

There is no income requirement to qualify for PSLF. However, since your required monthly payment amount under most of the qualifying PSLF repayment plans is based on your income, your income level over the course of your public service employment might be a factor in determining whether you have a remaining loan balance to be forgiven after making 120 qualifying payments.

Past periods of repayment will now count whether or not you made a payment, made that payment on time, for the full amount due, or on a qualifying repayment plan.

# **Q** I am a little confused, 10 years of public service is not sufficient, correct? One must also have been in repayment, yes?

Past periods of repayment will now count whether or not you made a payment, made that payment on time, for the full amount due, or on a qualifying repayment plan.

Forbearance periods of 12 consecutive months or greater, or 36 cumulative months or greater will count under the waiver. In fall 2022, ED will begin making account adjustments to include these periods. Forbearance periods provided by the COVID-19 Emergency Relief Flexibilities are not included toward these months.

Months spent in deferment before 2013 will count under the waiver. Additionally, ED will include Economic Hardship Deferment on or after January 1, 2013. These periods of deferment will also be applied to your account in fall 2022.

Periods of default and in-school deferment, still do not qualify.

The qualifying repayment plan rules have been temporarily suspended as a result of the limited PSLF waiver. You may receive credit toward PSLF, provided you had qualifying employment, if you're loans were in a repayment status, or during certain periods of deferment or forbearance, on any type of non-consolidation Direct Loan on any repayment plan. These loan types include

- Direct Subsidized Loans.
- Direct Unsubsidized Loans, and
- Graduate PLUS Loans made to students.

For consolidation loans, borrowers may get credit for payments made on the underlying loans after Oct. 1, 2007. <u>Learn more</u>.

Qualifying repayment plans include all of the <u>income-driven repayment (IDR) plans</u> (plans that base your monthly payment on your income).

While payments made under the 10-year Standard Repayment Plan are qualifying payments, you would have to change to an IDR plan to benefit from PSLF. Under the 10-year Standard Repayment Plan, generally your loans will be paid in full once you have made the 120 qualifying PSLF payments and there will be no balance to forgive. Before you change to an IDR plan, however, you should understand that your payment may increase under these plans depending on your income and the amount that you owe. If this is the case for you, and you do not wish to pay this higher amount, then the PSLF Program may not benefit you.

The following repayment plans do not normally qualify for PSLF (although during the Limited Waiver period they do:

- Standard Repayment Plan for Direct Consolidation Loans
- Graduated Repayment Plan
- Extended Repayment Plan
- Alternative Repayment Plan

#### **Q** Do 27 months of Peace Corps count as eligible months?

Yes, Peace Corps is qualifying employment and during the Limited Waiver period, forbearances of 12 consecutive months or 36 cumulative months will also count.

To qualify for PSLF, you must

- be employed by a U.S. federal, state, local, or tribal government or not-for-profit organization (federal service includes U.S. military service);
- work full-time for that agency or organization;
- have Direct Loans (or consolidate other federal student loans into a Direct Loan);
- repay your loans under an income-driven repayment plan\*; and
- make 120 qualifying payments.

Qualifying employment for the PSLF Program isn't about the specific job that you do for your employer. Instead, it's about who your employer is. Employment with the following types of organizations qualifies for PSLF:

- Government organizations at any level (U.S. federal, state, local, or tribal) this includes the U.S. military
- Not-for-profit organizations that are tax-exempt under Section 501(c)(3) of the Internal Revenue Code

Serving as a full-time AmeriCorps or Peace Corps volunteer also counts as qualifying employment for the PSLF Program.

The following types of employers don't qualify for PSLF:

- Labor unions
- Partisan political organizations
- For-profit organizations, including for-profit government contractors

Other types of not-for-profit organizations: If you work for a not-for-profit organization that is not tax-exempt under Section 501(c)(3) of the Internal Revenue Code, it can still be considered a qualifying employer if it provides certain types of <u>qualifying public services</u>.

<u>Use the PSLF Help Tool</u> to search for a qualifying employer, learn what actions you may need to take to be eligible for PSLF or TEPSLF, and generate the form you need.

# Q Since serving as a full-time AmeriCorps or Peace Corps volunteer counts as qualifying, would a paid internship with a nonprofit count?

If a qualifying employer hired you, pays you, and sends you a Form W-2 (Wage and Tax Statement) at the end of each tax year, you are employed by the qualifying employer.

On the other hand, if you were hired by a government contractor and the contractor issues your Form W-2, you are employed by the contractor. In this case, although you may be doing work for a qualifying employer (a government agency), you are not an employee of the qualifying employer.

It is not necessary that the employment be permanent.

### **Q** What about if you had months were you were unemployed?

Months in which you are unemployed will not count towards PSLF; however, the 120 months required to earn forgiveness need not be consecutive. For PSLF, you're generally considered to work full-time if you meet your employer's definition of full-time or work at least 30 hours per week, whichever is greater.

If you are employed in more than one qualifying part-time job at the same time, you will be considered full-time if you work a combined average of at least 30 hours per week with your employers.

If you are employed by a not-for-profit organization, time spent on religious instruction, worship services, or any form of proselytizing as a part of your job responsibilities may be counted toward meeting the full-time employment requirement.

Q From 2019 to early 2021, I was at \$0 monthly IDR payment plan because I was taking a break from practicing. since March 2022, I've been working at a non-profit legal aid. What is the best way to make sure all my qualifying months are counted towards PSLF

Past periods of repayment will now count whether or not you made a payment, made that payment on time, for the full amount due, or on a qualifying repayment plan. Use the PSLF Help Tool to search for a qualifying employer, learn what actions you may need to take to be eligible for PSLF or TEPSLF, and generate the form you need. Contact the PSLF servicer at 1-855-265-4038.

You can find out how many qualifying payments you've made by logging in to your account with the PSLF servicer and viewing your loan details or by looking on your most recent billing statement. You can also see the number of qualifying payments for each of your loans by logging into your <a href="StudentAid.gov account">StudentAid.gov account</a>, selecting My Aid, View Loans, then View Loan Details.

# Q Is there any new flexibility on qualifying positions - e.g. working full time at a government agency or 501c3 but on a 1099 tax form rather than a W-2?

Nothing about qualifying employment has changed. If a qualifying employer hired you, pays you, and sends you a Form W-2 (Wage and Tax Statement) at the end of each tax year, you are employed by the qualifying employer.

On the other hand, if you were hired by a government contractor and the contractor issues your Form W-2, you are employed by the contractor. In this case, although you may be doing work for a qualifying employer (a government agency), you are not an employee of the qualifying employer.

Qualifying employment for the PSLF Program isn't about the specific job that you do for your employer. Instead, it's about who your employer is. Employment with the following types of organizations qualifies for PSLF:

- Government organizations at any level (U.S. federal, state, local, or tribal) this includes the U.S. military
- Not-for-profit organizations that are tax-exempt under Section 501(c)(3) of the Internal Revenue Code

Serving as a full-time AmeriCorps or Peace Corps volunteer also counts as qualifying employment for the PSLF Program.

The following types of employers don't qualify for PSLF:

- Labor unions
- Partisan political organizations
- For-profit organizations, including for-profit government contractors

**Contractors:** You must be directly employed by a qualifying employer for your employment to count toward PSLF. If you're employed by an organization that is doing work under a contract with a qualifying employer, it is your employer's status—not the status of the organization that your employer has a contract with—that determines whether your employment qualifies for PSLF. For example, if you're employed by a for-profit contractor that is doing work for a qualifying employer, your employment does not count toward PSLF.

Other types of not-for-profit organizations: If you work for a not-for-profit organization that is not tax-exempt under Section 501(c)(3) of the Internal Revenue Code, it can still be considered a qualifying employer if it provides certain types of qualifying public services.

For PSLF, you're generally considered to work full-time if you meet your employer's definition of full-time or work at least 30 hours per week, whichever is greater.

If you are employed in more than one qualifying part-time job at the same time, you will be considered full-time if you work a combined average of at least 30 hours per week with your employers.

If you are employed by a not-for-profit organization, time spent on religious instruction, worship services, or any form of proselytizing as a part of your job responsibilities may be counted toward meeting the full-time employment requirement.

# **Q** What if you were in forbearance or deferment? Does the time worked in public service while you were in either F or D count towards the 10yrs?

Forbearance periods of 12 consecutive months or greater, or 36 cumulative months or greater will count under the waiver. In fall 2022, ED will begin making account adjustments to include these periods.

Forbearance periods provided by the COVID-19 Emergency Relief Flexibilities are not included toward these months.

Months spent in deferment before 2013 will count under the waiver. Additionally, ED will include Economic Hardship Deferment on or after January 1, 2013. These periods of deferment will also be applied to your account in fall 2022.

Periods of default and in-school deferment, still do not qualify.

Temporarily, under the terms of the Limited Waiver, certain periods of deferment and forbearance can be counted. Under normal rules, you can make qualifying monthly payments only during periods when you're required to make a payment. Therefore, you can't make a qualifying monthly payment while your loans are in

- an in-school status,
- the grace period,
- a deferment, or
- a forbearance.

If you want to make qualifying payments, but you're in a deferment or forbearance, contact your federal student <u>loan servicer</u> to waive the deferment or forbearance. However, you can still receive credit toward <u>PSLF during the COVID-19 payment pause</u>.

Your 120 qualifying monthly payments don't need to be consecutive. For example, if you have a period of employment with a nonqualifying employer, you will not lose credit for prior qualifying payments you made.

Your 120 qualifying monthly payments don't need to be consecutive. For example, if you have a period of employment with a nonqualifying employer, you will not lose credit for prior qualifying payments you made.

### **Q** Does COVID break count towards the eligible payments?

Yes, if you were employed full-time (30 hours) for an eligible employer.

https://studentaid.gov/announcements-events/pslf-limited-waiver

Use the PSLF Help Tool at studentaid.gov to certify your employment.

Q Several colleagues and I are employed by a private sector legal staffing agency that has assigned us to a work in contract positions at a nonprofit civil legal services organization. Does this work count toward public service loan forgiveness?

Unfortunately, no. The Department of Education has taken the position that employment for a for-profit entity is never qualifying, even if you are placed in a nonprofit position.

If a qualifying employer hired you, pays you, and sends you a Form W-2 (Wage and Tax Statement) at the end of each tax year, you are employed by the qualifying employer.

For example, if you were hired by a government contractor and the contractor issues your Form W-2, you are employed by the contractor. In this case, although you may be doing work for a qualifying employer (a government agency), you are not an employee of the qualifying employer.

### Q So what if I have yet to be in repayment? Can I enter and start before Oct 31, 2022?

Once the grace period expires, the period of the COVID forbearance may be counted towards forgiveness if the employment requirement is met. After October 31, 2022, borrowers may pursue PSLF under the normal rules.

If you're working toward Public Service Loan Forgiveness (PSLF) or finished making your 120 qualifying payments, you should complete and submit the PSLF & Temporary Expanded PSLF (TEPSLF) Certification & Application. Use the PSLF Help Tool to start your form: https://studentaid.gov/pslf

#### **Q** I'm sorry if I missed this, but can I enter now, or is it too late?

It's not too late. The relaxed rules under the Limited Waiver expire on October 31, 2022, but PSLF continues under its normal rules after that. If you're working toward Public Service Loan Forgiveness (PSLF) or finished making your 120 qualifying payments, you should complete and submit the PSLF & Temporary Expanded PSLF (TEPSLF) Certification & Application. Use the PSLF Help Tool to start your form: https://studentaid.gov/pslf

Q Do your qualifying hours need to be paid hours? For example, if I interned for a year at two qualifying non profits and my weekly hours exceeded 30 hours a week, can that time count towards repayment? also does that change if I was in school for part of that time?

Qualifying employment is full-time employment for pay. Volunteer work is not sufficient. A qualifying employer must hire you, pay you, and send you a Form W-2 (Wage and Tax Statement) at the end of each tax year, for you to be employed by the qualifying employer.

# Q What if you worked directly for the non profit and they're the ones who gave you a 1099 directly?

The Department of Education has taken the position that only W-2 employees are eligible. If a qualifying employer hired you, pays you, and sends you a Form W-2 (Wage and Tax Statement) at the end of each tax year, you are employed by the qualifying employer.

On the other hand, if you were hired by a government contractor and the contractor issues your Form W-2, you are employed by the contractor. In this case, although you may be doing work for a qualifying employer (a government agency), you are not an employee of the qualifying employer.

You must be employed full-time by a qualifying employer. This means that many government contractors won't qualify for PSLF.

# **Q** So, fulltime unpaid volunteer or intern positions with a nonprofit would not count, correct?

The only unpaid work that qualifies is serving as a full-time AmeriCorps or Peace Corps volunteer. Such positions are explicitly addressed in the program regulations.

**Q** Does the entire time loans have been on pause due to COVID count as months towards qualifying PSLF

Yes, if you certify having met the full-time qualifying public service employment using the PSLF Help Tool.

**Q** What if you spent time taking care of a sick family member...any chance that could count...or only paid positions?

Only full-time paid positions qualify. Vacation or leave time provided by your employer is counted as hours worked in determining whether you are a full-time employee. This includes leave taken for a qualifying condition under the *Family and Medical Leave Act of 1993*.

Q If I graduated in 2021, started working for a certified employer full time in May 2021 but didn't consolidate until December 2021 did I miss out on May-Nov counting toward PSLF?

No you did not. File the PSLF Form using the PSLF Help Tool to initiate the counting of those months.

**Q** What if I was in in-school deferment during the pandemic? would that time still count?

Periods of in-school deferment do not count towards PSLF, even during the COVID forbearance.

**Q** What happens if at some point I make income in addition to my public service salary?

If you remain a full-time (30 hours per week) employee (receiving a W-2) from an eligible employer, other income does not disqualify you from PSLF.

It will affect your monthly payment amount under Income Driven Repayment. (If your payments are larger than your current interest, the payments will reduce the loan balance that can be forgiven after 120 payments – but that is a function of IDR, not a failure to forgive your loan.)

https://studentaid.gov/manage-loans/repayment/plans

## **Refund**

### **Q** Please address the refund issue if you can!

If your <u>PSLF form</u> is approved for forgiveness, you will be notified that the entire remaining balance of your eligible Direct Loans will be forgiven, including all outstanding interest and principal. If you made payments after your 120th qualifying payment, those payments will be treated as overpayments and refunded to you.

Q I continued making payments through the pandemic, including paying off one loan, and now would like to get them refunded so I can opt into PSLF instead. I have contacted my servicer and they don't seem to know whether this is possible or how to do it

Early on in the COVID forbearance, borrowers were told they could receive refunds of payments made by contacting their loan servicers. The Department of Education has removed reference to this from the studentaid.gov website.

#### **Q** Does forgiveness include added interest?

If your PSLF form is approved for forgiveness, then you'll be notified that the entire remaining balance of your eligible Direct Loans will be forgiven, including all <u>outstanding</u> <u>interest</u> and <u>principal</u>. If you made payments after your 120th qualifying payment, those payments will be treated as overpayments and refunded to you as well.

#### However...

If we determine that you are not eligible for loan forgiveness, you will be notified of this determination and will be provided with the reason(s) you were determined to be ineligible. You will then be required to resume making payments on your loans according to the terms of your Master Promissory Note.

If you do not qualify for forgiveness, interest that accrued (accumulated) during the period when your form was being evaluated (and you were not required to make payments on your loans) may be capitalized.

<u>Capitalization</u> means that we add accrued interest to the unpaid <u>principal</u> amount of your loan. Capitalization increases the unpaid principal balance of your loan, and we will then charge interest on the increased principal amount.

**Q** I understood that every payment made, beyond the required 120, would be reimbursed if the loan is forgiven. Now I'm hearing that only payments made beyond the required 120, AFTER consolidating, are eligible for reimbursement. Which is correct?

Refunds only apply for payments (in excess of 120 payments) that were paid on a Direct loan.

# Payment Amount/Calculator

#### **Q** Can you change your payment plan?

Although you may select or be assigned a repayment plan when you first begin repaying your student loan, you can change repayment plans at any time—for free.

Contact your loan servicer if you would like to discuss repayment plan options or change your repayment plan. You can get information about all of the federal student loans you have received and find the loan servicer for your loans by logging in to "My Federal Student Aid."

To change your <u>repayment plan</u>, contact your <u>loan servicer</u>. If you have more than one loan servicer, you must contact the servicer affiliated with the loan you wish to change. To find your loan servicer, sign in to your "Account Dashboard" on StudentAid.gov.

Before you contact your loan servicer to discuss repayment plans, you can use <u>Loan</u> <u>Simulator</u> to get an early look at which plans you may be eligible for and to see estimates for how much you would pay monthly and overall.

**Q** I could only get an IBR "estimator", and I want to know what my actual payment would be.

Your exact payment depends on the documentation of income you provide to your loan servicer and the federal poverty rate for your family size. If you use the Loan Simulator at studentaid.gov and you enter an accurate income and family size, your actual payment will be the same, unless one or more of the inputs changes.

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

**Q** It's my understanding that the repayment amount is supposed to be a portion of one's disposable income, but when I tried to determine what mine would be it was a good deal more than my disposable income. What is the best place to find out the amount? Is there any appeal process?

Income-Driven Repayment plans set payments at a percentage of "discretionary income" as it is defined in the Higher Education Act. Most borrowers are eligible for payments of 10% of the amount by which Adjusted Gross Income exceeds 150% of federal poverty for the family size.https://studentaid.gov/pslf/

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

### https://studentaid.gov/manage-loans/pslf-reconsideration

After you understand why the PSLF servicer believes that your loans, employment, or payments don't qualify for PSLF, you can always submit additional information showing that your loans, employment, or payments do in fact qualify for PSLF. The PSLF servicer will reconsider its decision based on that additional information.

Q How do I determine how much for forbearance and/or deferment I've had?

You can review your loan history on your federal record at studentaid.gov.

**Q** All my loans are direct, I have made qualifying payments but after completing the PSLF Help Tool, it says I have done 0.

You can find out how many qualifying payments you've made by logging in to your account with the PSLF servicer and viewing your loan details or by looking on your most recent billing statement. You can also see the number of qualifying payments for each of your loans by logging into your <a href="StudentAid.gov account">StudentAid.gov account</a>, selecting My Aid, View Loans, then View Loan Details.

### https://studentaid.gov/manage-loans/pslf-reconsideration

After you understand why the PSLF servicer believes that your loans, employment, or payments don't qualify for PSLF, you can always submit additional information showing that your loans, employment, or payments do in fact qualify for PSLF. The PSLF servicer will reconsider its decision based on that additional information.

Q If you get married, does that affect your payments each month in a Pay As You Earn plan? If you have a prenuptial agreement, are can loan servicer still increase your payments if your spouse makes more money even though you do not share income?

Married borrowers will have payments calculated on joint income if they file a joint federal tax return or choose the REPAYE plan. Married borrowers may pay based on separate income by using the Married Filing Separately tax status and choosing any Income Driven Repayment Plan except REPAYE. Prenuptial agreements are not considered.

https://studentaid.gov/manage-loans/repayment/plans

# **Consolidation**

https://studentaid.gov/app-static/images/Instructions.pdf

https://studentaid.gov/manage-loans/consolidation#when-repay

https://studentaid.gov/app/launchConsolidation.action

**Q** Can you consolidate Perkins loans?

Yes. Most federal student loans are eligible for consolidation. A list of eligible loans is available at: https://studentaid.gov/manage-loans/consolidation#eligible-loans.

Q Is it true that if you consolidate loans, they will count your 120 payments from your earliest payment even if you only made payments on one loan at that time

Under the terms of the Limited Waiver, periods of certified employment will count when they overlap with periods in a repayment status as well as during some deferment and forbearance periods. Under normal PSLF Program rules, if you consolidate your loans, only qualifying payments that you make on the new Direct Consolidation Loan can be counted toward the 120 payments required for PSLF. Any payments you made on the loans before you consolidated them don't count. However, if you consolidate these loans into a Direct Loan before October 31, 2022, you may be able to receive qualifying credit for payments made on those loans through the limited PSLF waiver. Learn more.

The PSLF Help Tool will tell you whether you need to consolidate some or all of your loans.

Q Is there a need/benefit to consolidate your loans if you have all Direct loans (Stafford (subsidized and unsubsidized) and student plus). Thank you!

It is not necessary to consolidate loans that are already Direct Loans. There may be a benefit to consolidation if there are differing payment counts on the Direct Loans. A Direct Consolidation Loan allows you to consolidate (combine) multiple federal education loans into one loan. The result is a single monthly payment instead of multiple payments. Loan consolidation can also give you access to additional loan repayment plans and forgiveness programs. https://studentaid.gov/manage-loans/consolidation

**Q** I was told by my Loan Servicer that I needed to consolidate because some of my loans were not eligible because they were Graduate Plus Loans.

FFEL Graduate PLUS Loans must be consolidated in order to be eligible, yes. Direct Graduate PLUS loans are eligible without consolidating.

Most federal student loans are eligible for consolidation. A list of eligible loans is available at: <a href="https://studentaid.gov/manage-loans/consolidation#eligible-loans">https://studentaid.gov/manage-loans/consolidation#eligible-loans</a>.

Q Similar to my question on consolidation: If I've been enrolled in IDR and tracking PSLF on a law school loan for a number of years and then take out another loan (say a MFA/PHD program) while still in repayment, would I lose my prior payments

# towards the 120 if I consolidated those loans into the original loan. Better to just have two separate 120 day clocks going?

Under normal rules, consolidation would pay off the underlying loans are eliminate the loan histories; however, under the Limited Waiver, payments made before consolidation are preserved.

If you have more questions, review the "PSLF FAQ" page.

If your questions aren't covered on that page, contact FedLoan Servicing at 1-855-265-4038.

# **Q** If you apply for PSLF and IBR but then consolidate another loan, do you have to reapply for both?

Not usually, no, but Income-Driven Repayment Plans require annual recertification and PSLF Forms are best filed annually as well.

If you have more questions, review the "PSLF FAQ" page.

If your questions aren't covered on that page, contact FedLoan Servicing at 1-855-265-4038.

**Q** If you have consolidated FFELP loans can you now consolidate in a Direct Loan program to be eligible for forgiveness? I was told no in the past.

Yes. You are now permitted to reconsolidate a FFELP Consolidation Loan into Direct.

Q So it may be possible to get credit for pre-law school, pre-consolidation public service work, IF those pre-consolidated loans were federal AND I can get that employer to certify post-2007 employment?

Yes.

If you have more questions, review the "PSLF FAQ" page.

If your questions aren't covered on that page, contact FedLoan Servicing at 1-855-265-4038.

#### Q So all direct loans we have can be consolidated?

There are limitations to consolidation. For example, one Direct Consolidation Loan may not be consolidated unless additional loans are added. But in general, yes.

A Direct Consolidation Loan combines multiple federal education loans into one loan for free. You will have a single monthly payment on the new Direct Consolidation Loan. Apply to consolidate here: https://studentaid.gov/app/launchConsolidation.action

https://studentaid.gov/help-center/answers/article/direct-consolidation-loan

# Q If you've been on the PSLF loans and making payments then decided to go back to school- got new loans. Will the previous PSLF payments count towards the new loans?

No.

If you have more questions, review the "PSLF FAQ" page.

If your questions aren't covered on that page, contact FedLoan Servicing at 1-855-265-4038.

#### **Q** Can you consolidate again when new loans are added?

Yes, but be careful because after the Limited Waiver period ends on October 31, 2022, consolidation may set back the progress towards forgiveness.

https://studentaid.gov/app/launchConsolidation.action

### **Q** Can you consolidate more than once?

Not generally, unless you are adding new loans or reconsolidating a FFELP Consolidation loan in order to access PSLF.

If you have multiple student loans you may be able to combine them into one loan with a fixed interest rate based on the average of the interest rates on the loans being consolidated. <u>Learn</u> more about loan consolidation.

A Direct Consolidation Loan allows you to consolidate multiple federal education loans into one loan at no cost to you.

Through your completion of the free Federal Direct Consolidation Loan Application and Promissory Note, you will confirm the loans that you want to consolidate and agree to repay the new Direct Consolidation Loan.

Once the consolidation is complete, you will have a single monthly payment on the new Direct Consolidation Loan instead of multiple monthly payments on the loans you consolidated.

**Alert!** On Oct. 6, 2021, the U.S. Department of Education announced a temporary period during which borrowers may receive credit for payments that previously did not qualify for PSLF or TEPSLF. Learn more about this time-limited opportunity.

#### **Q** My loans says Unsubsidized Loan, can I still consolidation

Yes. If you have multiple student loans you may be able to combine them into one loan with a fixed interest rate based on the average of the interest rates on the loans being consolidated. Learn more about loan consolidation.

A Direct Consolidation Loan allows you to consolidate multiple federal education loans into one loan at no cost to you.

Through your completion of the free Federal Direct Consolidation Loan Application and Promissory Note, you will confirm the loans that you want to consolidate and agree to repay the new Direct Consolidation Loan.

Once the consolidation is complete, you will have a single monthly payment on the new Direct Consolidation Loan instead of multiple monthly payments on the loans you consolidated.

**Alert!** On Oct. 6, 2021, the U.S. Department of Education announced a temporary period during which borrowers may receive credit for payments that previously did not qualify for PSLF or TEPSLF. Learn more about this time-limited opportunity.

## **Certification/Documentation**

Q Is there anything in the relaxed rules that will allow certification of employment that is with a public service employer, but technically receiving paystubs with a private recruiter that ordinarily doesn't qualify under PSLF?

No. Nothing about the qualifying employment requirement has changed. If a qualifying employer hired you, pays you, and sends you a Form W-2 (Wage and Tax Statement) at the end of each tax year, you are employed by the qualifying employer.

On the other hand, if you were hired by a government contractor and the contractor issues your Form W-2, you are employed by the contractor. In this case, although you may be doing work for a qualifying employer (a government agency), you are not an employee of the qualifying employer.

You must be employed full-time by a qualifying employer. This means that many government contractors won't qualify for PSLF.

Qualifying employment for the PSLF Program is not about the specific job that you do for your employer. Rather, it is about who your employer is. Employment with the following types of organizations qualifies for PSLF:

- Government organizations at any level (federal, state, local, or tribal)
- Not-for-profit organizations that are tax-exempt under Section 501(c)(3) of the IRS code
- Other not-for-profit organizations that are not tax-exempt under the same IRS code and that provide certain public services

Full-time volunteer service in AmeriCorps or Peace Corps also counts toward the PSLF Program.

Find more information about the limited PSLF waiver opportunity and how it impacts borrowers.

#### **Q** I have never certified, is that an issue?

No but do it now and by all means before October 31, 2022 to get access to the relaxed rules of the Limited Waiver.

To ensure you're on the right track, you should submit a *Public Service Loan Forgiveness* (*PSLF*) & *Temporary Expanded PSLF* (*TEPSLF*) *Certification* & *Application* (*PSLF*) Form) annually or when you change employers. We'll use the information you provide on the form to let you know if you are making qualifying PSLF payments. This will help you determine if you're on the right track as early as possible.

**Note:** If you don't periodically submit the PSLF form, then at the time you apply for forgiveness, you will be required to submit employment certification for each employer where you worked while making the required 120 qualifying monthly payments.

Q How do we CONFIRM that our months at a qualifying employer PRIOR to consolidation are being counted (pursuant to limited waiver)? We send in certification and then how do we check that they've counted correctly?

Access your loan history via studentaid.gov under My Aid, Download My Aid data.

You can find out how many qualifying payments you've made by logging in to your account with the PSLF servicer and viewing your loan details or by looking on your most recent billing statement. You can also see the number of qualifying payments for each of your loans by logging into your StudentAid.gov account, selecting My Aid, View Loans, then View Loan Details.

employment for the PSLF Program.

Q I think you said this, but I just want to confirm, that our prior certifications are still valid and we do not need to recertify for those time periods that we already certified, correct? Or do we need to recertify to make sure they covered all of the time that we worked for a public interest org, rather than merely covering those payments that met the criteria before the waiver?

File a PSLF Form certifying employment for every period of qualifying employment since October 7, 2007 and do it before October 31, 2022. If you are confident that specific periods of employment have already been recognized and all months counted properly, there is no need to refile for those periods.

Even if you submitted PSLF forms to the PSLF servicer during the entire period when you were making your 120 qualifying payments, you will need to show that you are employed full-time with a qualifying employer at the time you submit your final PSLF form. The PSLF form will include an employment certification section that must be completed by the qualifying employer where you are employed at the time you submit the form.

If you did not submit any PSLF forms to certify your employment prior to applying for PSLF, or if you submitted forms for only some of your employers or for only a portion of your period of qualifying employment, you will need to provide one or more PSLF forms, as necessary, to cover your entire period of qualifying employment (including your current employment) at the time you apply for PSLF.

**Note:** If you don't periodically submit the PSLF form, then at the time you apply for forgiveness, you will be required to submit employment certification for each employer where you worked while making the required 120 qualifying monthly payments.

**Q** Once you've gotten employment certification for a former employer, do you have to keep getting their signature on the PSLF form when you recertify every year? or can you just get your current employer's signature for subsequent PSLF forms?

Previous employers only need to sign one form as long as your full period of qualifying employment is listed on that form. You need each form to be signed, and you need to file signed forms covering all the months of qualifying employment.

To ensure you're on the right track, you should submit a *Public Service Loan Forgiveness* (*PSLF*) & *Temporary Expanded PSLF* (*TEPSLF*) *Certification* & *Application* (*PSLF*) Form) annually or when you change employers. We'll use the information you provide on the form to let you know if you are making qualifying PSLF payments. This will help you determine if you're on the right track as early as possible.

**Note:** If you don't periodically submit the PSLF form, then at the time you apply for forgiveness, you will be required to submit employment certification for each employer where you worked while making the required 120 qualifying monthly payments.

You must submit a <u>PSLF Form</u> showing that you were employed full-time by a qualifying employer at the time you made each of the required 120 payments.

Q So if we are barely documenting our employment from the last 10+ years is there a chance that we won't qualify?

If you've documented more than 120 months of qualifying employment <u>and</u> those months overlap with periods when your loans were in a repayment status, certain deferments and forbearances, then the program requirements are met.

Even if you submitted PSLF forms to the PSLF servicer during the entire period when you were making your 120 qualifying payments, you will need to show that you are employed full-time with a qualifying employer at the time you submit your final PSLF form. The PSLF form will include an employment certification section that must be completed by the qualifying employer where you are employed at the time you submit the form.

If you did not submit any PSLF forms to certify your employment prior to applying for PSLF, or if you submitted forms for only some of your employers or for only a portion of your period of qualifying employment, you will need to provide one or more PSLF forms, as necessary, to cover your entire period of qualifying employment (including your current employment) at the time you apply for PSLF.

Q If you have less than 120 months of qualified certified public interest employment, what will happen to your loans as of Oct 31, 2022?

Make sure your payment count is accurate for the periods before October 31, 2022, then understand that you must meet the normal, more stringent PSLF requirements after that. Verify that you have Direct Loans, are enrolled in an IDR plan, and are making on time monthly payments of the full amount due so that you can continue accruing towards the 120.

#### https://studentaid.gov/manage-loans/pslf-reconsideration

After you understand why the PSLF servicer believes that your loans, employment, or payments don't qualify for PSLF, you can always submit additional information showing that your loans, employment, or payments do in fact qualify for PSLF. The PSLF servicer will reconsider its decision based on that additional information.

Q Is the PSLF form submitted to the PSLF servicer a form for each year you work in the same company?

It's not required that you do it every single year, but eventually you'll need to submit forms covering the full 120 months required. Technically you could just file one form at the end (assuming you only worked at one place), but the better practice is to file annually.

Q So since there is no temporary waiver period application, how can you get updated on the forgiveness status?

Monitor your account through your loan servicer site. Look for a qualifying payment count. If it's not right, you can file for reconsideration.

### https://studentaid.gov/manage-loans/pslf-reconsideration

After you understand why the PSLF servicer believes that your loans, employment, or payments don't qualify for PSLF, you can always submit additional information showing that your loans, employment, or payments do in fact qualify for PSLF. The PSLF servicer will reconsider its decision based on that additional information.

**Q** What do we do if the "Download My Aid Data" does not show the correct number of months in qualifying employment?

First ensure that you've filed PSLF Forms covering every month of qualifying employment since October 1, 2007. <a href="https://studentaid.gov/manage-loans/pslf-reconsideration">https://studentaid.gov/manage-loans/pslf-reconsideration</a>

After you understand why the PSLF servicer believes that your loans, employment, or payments don't qualify for PSLF, you can always submit additional information showing that your loans, employment, or payments do in fact qualify for PSLF. The PSLF servicer will reconsider its decision based on that additional information.

### https://studentaid.gov/manage-loans/repayment/servicers

**Q** Who signs the form? A supervisor or HR?

Your employment can be certified by an official who has access to your employment or service records and is authorized by your employer to certify your employment. This will often be someone in the human resources department, though in some cases your direct supervisor or another individual may be authorized to certify your employment. Check with your organization to see who is allowed to certify your PSLF Form.

**Q** What if we're not able to get a WET signature. Is there a form that we could forward to our former employers or would something like DocHub work?

Do what you have to do to get a <u>WET</u> signature. Print the PSLF Form, sign it, scan it using an app like TurboScan, email the form to HR and have them do the same thing. If your employer is no longer in existence, you can check a box on the form that says you can't get it signed, but that will slow down approval and you may be asked for other documentation.

A reminder about digital signatures: Digital signatures from you or your employer must be hand drawn (from a signature pad, mouse, finger, or by taking a picture of a signature drawn on

a piece of paper that you then scan and embed on the signature line of the PSLF form) to be accepted. Typed signatures, even if made to mimic a hand-drawn signature, or security certificate-based signatures are not accepted.

### **Signature Examples**

Signature Type	Yes/No
Hand drawn from signature pad, mouse, or finger	<b>√</b>
Typed using a cursive font or any other font	X
A scanned photo of a signature that was hand-drawn on paper	<b>√</b>
Digital certificate-based signature	X
A wet signature that was drawn in ink and sent to us in its original format	<b>√</b>

# **Q** Follow up question: Would a hand drawn signature on a touchpad suffice for a WET signature?

**Yes.** A reminder about digital signatures: Digital signatures from you or your employer must be hand drawn (from a signature pad, mouse, finger, or by taking a picture of a signature drawn on a piece of paper that you then scan and embed on the signature line of the PSLF form) to be accepted. Typed signatures, even if made to mimic a hand-drawn signature, or security certificate-based signatures are not accepted.

### **Signature Examples**

Signature Type	Yes/No
Hand drawn from signature pad, mouse, or finger	<b>√</b>
Typed using a cursive font or any other font	X
A scanned photo of a signature that was hand-drawn on paper	<b>√</b>
Digital certificate-based signature	X
A wet signature that was drawn in ink and sent to us in its original format	<b>√</b>

# **Consultants/Professional Help**

**Q** Are there professionals that can help review individual situations that you could recommend?

Beware of scams. Ask for recommendations from trusted sources and understand that many financial advisors are most focused on wealth management. Consider evaluating a Certified Student Loan Professional (CSLP).

## MISC:

**Q** When I go to the federal aid website it says "discharged" but I then got mail from Mohele and they haven't provided much information. Does this mean my loans were sold to a new company?

Discharged generally means your balance has been eliminated. In some cases, we need to transfer loans from one servicer to another servicer. If we transfer your federal student loans from one servicer to another servicer, your loans will still be owned by ED. The "transfer" to another servicer simply means that a new servicer will provide the support you need to fully repay your loans.

Here's what you should expect if your loan is transferred to a new servicer:

- You will receive an email or a letter from your assigned servicer to inform you about the transfer.
- You will receive a welcome letter from the new servicer after the new servicer receives your loans. This notice will provide you with the contact information for the new servicer and inform you of actions that you may need to take.
- All of your loan information will be transferred from your assigned servicer to your new servicer, but you may only be able to see online information that covers the period since your new servicer took your loans over.
- There will be no change in the terms of your loans.
- Your previous loan servicer and new loan servicer will work together to make sure that all payments you make during the transfer process are credited to your loan account with the new servicer.

After you receive the welcome letter from your new servicer, you should do the following:

- Begin sending your loan payments to your new servicer. If you use a bank or bill paying service to make your loan payments, update the new servicer's contact information with the bank or bill paying service.
- Follow the new servicer's instructions for creating an online account so that you can more easily communicate with the new servicer and keep track of your loan account.

https://studentaid.gov/manage-loans/repayment/servicers#assignment

# **Q** Is there a way to get a certification from studentaid.gov that they have received and processed a certification?

Not really but FedLoan has something called the Payment Tracker, and presumably MOHELA will as well. Processing times will vary depending on factors such as whether you previously submitted documentation of employment for review or submitted documentation only at the time you applied for loan forgiveness, the number of your employers, any gaps in your employment or payment history, and any required follow-up.

If you periodically submitted the PSLF form so that your eligibility could be tracked while you were making the required 120 payments, your form for loan forgiveness will likely be processed more quickly.

Once the PSLF servicer has received all of the documentation needed to determine whether you qualify for loan forgiveness, you will be notified. You are not required to continue making payments on your loans during the period when your loan forgiveness form is being processed. However, if you want to continue making payments, you may indicate this on your PSLF form.

### **Q** What will happen if my PSLF form is approved?

If your PSLF form is approved for forgiveness, you will be notified that the entire remaining balance of your eligible Direct Loans will be forgiven, including all outstanding interest and principal. If you made payments after your 120th qualifying payment, those payments will be treated as overpayments and refunded to you.

# **Q** Is it a problem if my current loan status is "Forbearance" since the pandemic emergency orders were made in March 2020?

The COVID forbearance will count towards PSLF as long as you file a PSLF Form certifying employment.

https://studentaid.gov/announcements-events/pslf-limited-waiver

### **Q** What do you recommend for older employment

Older employment back to October 1, 2007 can count. File the PSLF Form.

### **Q** Is it normal to not get a response after submitting the PLF form?

Yes. Eventually, your qualifying payment count should be updated at your loan servicer site. Processing times will vary depending on factors such as whether you previously submitted documentation of employment for review or submitted documentation only at the time you applied for loan forgiveness, the number of your employers, any gaps in your employment or payment history, and any required follow-up.

If you periodically submitted the PSLF form so that your eligibility could be tracked while you were making the required 120 payments, your form for loan forgiveness will likely be processed more quickly.

Once the PSLF servicer has received all of the documentation needed to determine whether you qualify for loan forgiveness, you will be notified. You are not required to continue making payments on your loans during the period when your loan forgiveness form is being processed. However, if you want to continue making payments, you may indicate this on your PSLF form.

**Q** My studentaid.gov account says my loans were "discharged" I am not sure what this means and I can't get more info from the website...

https://studentaid.gov/manage-loans/repayment/servicers

Q If you have fed aid and PSLF tracker says you have x number of qualified payments, what document should you save as they are closing or what proof should you keep?

Save a PDF of the Payment Tracker to be safe.

## **Q** Do you know if there's likely to be any changes to the bankruptcy provisions?

There are bills pending in Congress, but it would require an act of Congress, and the Senate is unlikely to let such bills come to a vote.

## **Sources of Information and Assistance:**

## • PSLF Tool

Public Service Loan Forgiveness (PSLF) Help Tool and Combined PSLF Form

There's now one combined form to certify your employment, apply for PSLF, or apply for Temporary Expanded PSLF. And our enhanced tool will help you complete the form required for this program. Learn more and give it a try!

### Eligible Loans

https://studentaid.gov/manage-loans/forgiveness-cancellation/public-service/questions#eligible-loans

### More Info

If you have more questions, review the "PSLF FAQ" page.

If your questions aren't covered on that page, contact FedLoan Servicing at 1-855-265-4038.

#### Qualifying Payments

After you submit a PSLF Form, if you don't yet have 120 qualifying payments, your loans will transfer to the PSLF servicer. After the PSLF servicer determines how many qualifying payments you made during the employment period on your form, you'll receive a letter telling you the number of qualifying payments you have made.

If the limited PSLF waiver period makes you immediately eligible for forgiveness, your loan may not transfer to the PSLF servicer. Learn more.

The number of qualifying payments you have made will **only** be updated whenever you submit another PSLF form that documents a new period of qualifying employment.

#### Info about your loan

You can find out how many qualifying payments you've made by logging in to your account with the PSLF servicer and viewing your loan details or by looking on your most recent billing statement. You can also see the number of qualifying payments for each of your loans by logging into your StudentAid.gov account, selecting My Aid, View Loans, then View Loan Details.

#### Appeals/Reconsideration

https://studentaid.gov/manage-loans/pslf-reconsideration

• Repayment Plans

https://studentaid.gov/manage-loans/repayment/plans

• Who is my loan student loan servicer?

https://studentaid.gov/manage-loans/repayment/servicers