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Public Service Loan Forgiveness Statewide Initiative Plan – Report to the Legislature

Required by RCW 43.41.425



WASHINGTON STATE
Office of Financial Management
State Human Resources

Washington Student Achievement Council
Office of the Student Loan Advocate



Acknowledgments

State Human Resources Division
Washington State Office of Financial Management
P.O. Box 43113
Olympia, WA 98504-3113

ofm.wa.gov/PSLF_Program

(360) 725-5100

info@ofm.wa.gov

Office of the Student Loan Advocate
Washington Student Achievement Council
P.O. Box 43430
Olympia, WA 98504-3430

wsac.wa.gov/PSLF

(360) 753-7800

info@wsac.wa.gov

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Table of Contents

Executive Summary	1
Key Highlights.....	2
State Policy Recommendations	4
Washington PSLF SW Initiative Plan.....	8
Background	8
What is PSLF?.....	8
Washington PSLF data	13
Summary of Washington state legislation	16
PSLF outreach to date.....	19
Data from surveys	25
Strengthening PSLF in Washington.....	32
Continuing Efforts to Expand PSLF Access	32
Findings	35
Ongoing, Reliable Information Is Needed.....	35
Resource Allocation for the Student Loan Advocate (SLA)	37
Complaints and Requests for Assistance to the SLA	37
OFM Oversight Limits.....	39
State government agencies.....	39
Non-state government employers	40
Employer data constraints	40
Federal Policy Recommendations.....	42
Appendix A: PSLF Timeline	45
Appendix B: Borrower Webinar Survey	46
Appendix C: Borrower and Employer Surveys	47
Appendix D: PSLF Borrower Count and Loan Discharge Data sources.....	49
Acronym Glossary.....	50
References	51

Executive Summary

This report provides an overview of the statewide initiative plan for Washington to support student loan borrowers pursuing the federal Public Service Loan Forgiveness (PSLF) program, in accordance with RCW 43.41.425, including steps taken to date, future activities and recommendations for additional actions at the state and federal levels. The program's current and future activities and this report's recommendations reflect legislative direction to focus on increasing awareness, improving access, and removing barriers to loan forgiveness for Washington state student loan borrowers.

The Office of Financial Management (OFM) extends our gratitude to staff of the Washington Student Achievement Council (WSAC) Office of the Student Loan Advocate (SLA), members of the PSLF Statewide Initiative Committee, and PSLF Charter members for their assistance and collaboration in completing this report.

Washington PSLF achievements to date:

- OFM successfully launched the PSLF employment certification program for state agencies, effective July 1, 2023.
- OFM assisted the SLA in creating and distributing resource materials and conducting outreach events to increase awareness of the PSLF program.
- The PSLF Statewide Initiative Committee was established to collaborate in developing a statewide initiative to improve awareness and access and remove barriers to public service loan forgiveness.

The plan for Washington's PSLF statewide initiative builds on the success of the program since 2022 through performing ongoing outreach, enhancing resource materials, and expanding partnerships to help Washington public service borrowers achieve student loan forgiveness. However, the PSLF Statewide Initiative Committee identified several areas where additional statutory changes or additional resources for implementation can further improve PSLF access for employers and borrowers. These include recommendations that would expand resources and outreach to nonprofit employers and local and Tribal governments. The committee also noted federal policy recommendations to address federal PSLF program challenges.

Key Highlights

Requiring employers to certify PSLF forms and share information benefits with borrowers

- **Statewide Initiative outcome and ongoing effort – Significant increase in PSLF discharges:** Since the implementation of Chapter 248, Laws of 2022 in March 2022, PSLF discharges have increased by 565%, resulting in \$1.4 billion of student loan debt forgiven for Washingtonians as of June 2024. This suggests that requiring employer certification and sharing information decreases barriers and improves access to PSLF.
- **Statewide Initiative outcome and ongoing effort – Support and Outreach by SLA:** Since 2022, SLA has assisted over 973 individual borrowers with requests for assistance with loan forgiveness. Over 2,000 borrowers have attended SLA/OFM PSLF webinars, and corresponding webinar recordings have over 3,400 views.
- **Statewide Initiative future effort – Need for further research:** OFM and SLA will partner with the Office of the Secretary of State (SOS), Department of Financial Institutions (DFI), Employment Security Department (ESD), Department of Labor and Industries (L&I), and Department of Licensing (DOL) to conduct research and explore recommendations for oversight of a statewide employer certification program for non-state government organizations and methods to identify PSLF-eligible nonprofit employers.

Additional outreach is needed for employers and employees of nonprofits, local governments, and Tribal governments

- **Statewide Initiative ongoing efforts – Need for public service employer education:** Many employers remain confused about the PSLF process and whether they qualify as a PSLF-eligible employer. The PSLF statewide initiative program will enhance employer education efforts to increase understanding of PSLF eligibility criteria by highlighting both the criteria and qualifying public service functions during presentations and in written materials.
- **Statewide Initiative ongoing efforts – Ongoing outreach due to federal changes:** Frequent changes to the PSLF program at the federal level necessitate continuous outreach efforts to keep both public service employers and employees in Washington informed and up to date.

- **Statewide Initiative future effort – Recruitment and retention benefits:** According to the borrower survey conducted by OFM and SLA, the PSLF program may serve as an effective tool for recruiting and retaining employees in the public sector.

Collaboration with Federal Student Aid will improve access to PSLF

- **Statewide Initiative future effort – Implementation challenges:** State implementation of Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 is hindered by data and resource constraints at the Office of Federal Student Aid (FSA) at the U.S. Department of Education.
- **Statewide Initiative future effort – Potential of data sharing agreements:** Establishing data-sharing agreements between FSA and Washington could significantly address employer certification barriers, benefiting employers and borrowers.

More PSLF borrower outreach is needed to support historically marginalized communities

- **Statewide Initiative future effort – Disproportionate impact on communities of color and women:** Communities of color and women are disproportionately affected by student loan debt. The PSLF statewide initiative program will target additional outreach to these employees by engaging state business resource groups, the Office of Equity, and state commissions.
- **Statewide Initiative future effort – Significant impact on Black women:** Black women are the most negatively affected group due to systemic racism in educational and financial institutions, as well as the racial wealth gap. The PSLF statewide initiative program will work with the WSAC Consumer Protection Division to develop materials to increase awareness of trustworthy resources for student loan information and target additional outreach to these employees by engaging state business resource groups, the Office of Equity, and state commissions.

Borrower protections can be strengthened through servicer oversight and requirements

- **Statewide Initiative advocacy/future effort – Need for stronger consumer protection against servicer misinformation:** Student loan servicers often share incomplete or incorrect information about PSLF, which negatively impacts the ability of borrowers to achieve forgiveness. Strengthening state consumer protection laws

will help address servicer misinformation and ensure Washington borrowers are not harmed.

State Policy Recommendations

OFM and SLA have compiled a list of policy recommendations based on the feedback gathered from our PSLF Statewide Initiative Committee, student loan borrower complaint data, borrower and employer surveys, and state and federal laws enacted in the last four years.

- 1) **To remove barriers faced by borrowers, require local government entities and all PSLF-eligible nonprofit organizations in Washington to share PSLF information with their employees and certify their employment.** This recommendation would require statutory changes. It is proposed for implementation in fiscal year (FY) 2026.

Federal and Tribal government entities should be excluded from this requirement. A collaborative, rather than regulatory approach, is recommended and more likely to be successful.

Employer and borrower survey data indicates this requirement is effective for improving access and removing barriers to loan forgiveness. In addition, the state of New York passed a similar bill in September 2022 ([A9523B](#)) amending Article 34 of the labor law to include PSLF employment certification requirements for all public employers in the state. New York's law does not include notification requirements and excludes federal and Tribal government entities.¹

In addition to requiring employers to certify employment, requiring the following documents be shared with nonprofit and local government agency employees would be beneficial:

- PSLF Notices for New Employees, PSLF Annual Notice, and PSLF Notice for Separated Employees. These notices were developed in accordance with Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 and are already required to be distributed by Washington state agencies.
- A PSLF workplace poster, created by the SLA, posted at physical workplaces and provided virtually to remote employees. State agencies should also adopt these additions.

- 2) **Make all PSLF resource materials required by Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 available in other languages to increase access and remove barriers for borrowers.** This recommendation will require additional funding that could be considered by the Legislature or future governor's administration. It is proposed for implementation in FY 2026.

Feedback from the PSLF Initiative Committee and the employer survey identified a need for materials to be available in other languages beyond English, with Spanish specifically being suggested. Further research may be conducted to identify other possible languages that may be beneficial to remove barriers to the PSLF program. This is especially important as there are no translated PSLF materials currently available at the federal level.

- 3) **Provide American Sign Language (ASL) interpretation or closed captioning for all OFM and SLA PSLF presentations and recorded videos to increase access and remove barriers for borrowers.** This recommendation will require additional funding for SLA that could be considered by the Legislature or future governor's administration. It is proposed for implementation in FY 2027.

Interpretive services are currently offered when requested in advance. However, public service employers who employ or provide support for borrowers who require ASL or screen readers to communicate have indicated the need to make interpretation available for all PSLF presentations. This would ensure all borrowers have the information they need to access the PSLF program.

- 4) **To effectively expand outreach and improve equity, future increases to SLA staffing could be considered.** This recommendation is contingent on implementation of Recommendation 1 and will require additional full-time equivalent (FTE) increases that could be considered by the Legislature or future governor's administration. It is proposed for implementation in FY 2026.

PSLF statewide committee members have indicated additional outreach to local government entities and nonprofit organizations would improve access to the PSLF program. SLA has identified the following roles could be used to accomplish this.

- A. **PSLF Outreach Coordinator.** The PSLF Outreach Coordinator would work in collaboration with the PSLF Program Associate to develop relationships with public employers in Washington state, train employers on best practices to support their employees on their path toward PSLF and offer in-person and virtual webinars to borrowers on PSLF. The PSLF Outreach

Coordinator would also be responsible for assisting the SLA in creating communication materials, such as email templates, posters, and videos to educate both borrowers and employers about PSLF.

B. **Student Loan Equity Advocate.** In addition to helping the Student Loan Advocate with responding to borrower complaints, the Equity Advocate would develop relationships with community organizations serving borrowers from communities of color, train advocates on a variety of student loan topics (including PSLF) in communities across Washington, and advocate for changes at the state and institutional levels. The Equity Advocate would also foster relationships with Tribal government officials to share information and ensure Tribal government employees can access the PSLF program.

5) **Require student loan servicers to provide Washington state borrowers with an annual notice listing all forgiveness options available to borrowers, including PSLF.** This recommendation would require collaboration with DFI and statutory changes. It is proposed for implementation in FY 2027.

The annual notice should include a phone number for the servicer whom the borrower may contact for questions about loan forgiveness, as well as information on how the borrower may contact SLA for assistance.

6) **Increase student loan servicer oversight through adoption of the following provisions from the California Student Borrower Bill of Rights (AB 376) to strengthen borrower protections.** This recommendation would require collaboration with DFI and statutory changes. It is proposed for implementation in FY 2027 and is based on the Student Loan Advocate 2021 legislative report.²

A. Past due fees should be reasonable and proportional to the total costs incurred due to the late payment – not to exceed 6% of the past due amount. There should be no “minimum” flat rate fees.

B. Require that each state licensee has a minimum of three employees who are specifically trained and knowledgeable on specific types of borrowers and loan programs including:

- Public Service Loan Forgiveness and Temporary Expanded Public Service Loan Forgiveness
- Veterans and service members
- Total and permanent disability discharge

- Teacher Loan Forgiveness
- Closed school issues and related loan discharge programs including Closed School Discharge, Borrower Defense to Repayment, and False Certification Discharge

7) **Establish the Student Borrower Peer Advocacy program to increase awareness, improve access, and remove barriers for borrowers.** This recommendation would require statutory changes, SLA funding, and FTE increases that could be considered by the Legislature or future governor’s administration. It is proposed for implementation in FY 2028 and is based on the Student Loan Advocate 2021 legislative report.³

This program would aim to create at least one peer advocate position at each higher education institution in Washington to serve current student borrowers at their school. SLA would provide support and training to these peer advocates so that they may provide student loan borrowers with a local, reliable resource for student loan information, including options for student loan forgiveness upon graduation. The peer advocate positions should be paid and may be part of the State Work Study program.

OFM supports the goals of recommendations 1, 2, and 3, which can improve PSLF access for employers and borrowers, but acknowledges budgetary resources would be required and are likely to be unavailable in the upcoming biennial budget. OFM is also supportive of recommendations 4, 5, 6, and 7, which support WSAC functions and increase protection for borrowers, but similarly acknowledges budgetary resources are unlikely to be available in the near term. OFM is also supportive of [federal policy recommendations](#) for PSLF program challenges that cannot be addressed at the state level.

Washington PSLF SW Initiative Plan

Background

“Because tuition has increased well beyond the rate of student assistance, students today are graduating with staggering debt burdens. With the weight of this debt on their backs, recent college graduates understandably gravitate toward higher paying jobs that allow them to pay back their loans. Unfortunately, all too often these jobs are not in the arena of public service or areas that serve the vital public interests of our communities and of our country. We need to be doing more to support graduates who want to enter public service, be it as a childcare provider, a doctor or nurse in the public health field, or a police officer or other type of first responder.”

—Sen. Leahy, 110 Cong. Rec. S9574-02 (July 19, 2007)

What is PSLF?

The federal Public Service Loan Forgiveness program, known as PSLF, was included in the 2007 College Cost Reduction Act,⁴ which had bipartisan support in Congress,⁵ and was signed into law by President George W. Bush. The premise of the program is to forgive the remaining student loan balance of borrowers after 10 years of public service employment. To qualify for PSLF, borrowers must meet four specific requirements related to:

1. the type of employment
2. the type of federal student loans
3. the repayment plan
4. the number of payments

While the four requirements sound simple, each requirement is uniquely complex and can be challenging for student loan borrowers to navigate. Figure 1 shows the elements involved in each requirement which can create the following barriers to obtaining PSLF approval.

1) Confirm Eligible Employment

- Employers can be incorrectly listed as ineligible, not found, or undetermined in the employer search.
- Borrowers may have to provide documentation to prove their employer’s eligibility.
- It can take a year or more for an employer to be approved by FSA.
- Employers can refuse to sign PSLF forms, requiring those borrowers to provide additional documentation.

2) Confirm Loan Eligibility

- It can be confusing for a borrower to determine if they need to consolidate their loans for PSLF eligibility.
- Outdated PSLF information on the consolidation application can scare borrowers.
- Consolidating loans with varying amounts of PSLF-qualifying payment counts may result in losing some time toward PSLF due to the new weighted average rule.
- The weighted average calculation hasn't been publicly available for borrowers to review.

3) Choose a qualifying repayment plan

- Borrowers may have confusion on which income driven repayment plan(s) (IDR) they may qualify for.
- Married borrowers must determine the interaction with tax filing status when applying for an IDR plan.
- Often the loan simulator on StudentAid.gov is inaccurate or out of date.
- Ongoing litigation has impacted the availability of some IDR plans.

4) Make qualifying payments

- Borrowers often discover they are missing payment history from loan servicers.
- There may be confusion over which forbearances and deferments are eligible for PSLF.
- Borrowers have been unable to see what type of forbearance they may be in.

Federal changes to the PSLF program

This complexity became apparent in 2017 when the first cohort of student loan borrowers reached 10 years of qualifying service. These borrowers encountered challenges such as:

- Confusing and often conflicting information from student loan servicers and/or the U.S. Department of Education (ED).
- Discovering they had a loan ineligible for PSLF or not enough qualifying payments.
- Finding out they had been under the wrong type of repayment plan.
- Having employer(s) refuse to sign employment certification forms or provide documentation.⁶

Figure 1. Public Service Loan Forgiveness Application Process



Since 2017, ED has attempted to address these barriers through three separate initiatives (see [Appendix A](#) for a detailed timeline of PSLF). In 2023, ED also announced new regulations to make long-lasting improvements to PSLF.⁷ While these changes have helped numerous borrowers achieve forgiveness under PSLF, many borrowers continue to struggle with understanding the complex requirements and accessing the program.

Adding difficulty to navigating PSLF, the program has historically been managed by a single student loan servicer, most recently, MOHELA. Borrowers relied on MOHELA to process PSLF applications, update payment counts and approve PSLF employment. A 2024 report, authored by the American Federation of Teachers (AFT) and the Student Borrower Protection Center (SBPC), found that public service workers were greatly harmed by MOHELA's mismanagement and servicing failures.⁸

ED is in the process of changing the way borrowers interact with loan servicers and FSA. The primary goal of this initiative, named the Unified Servicing and Data Solution (USDS), is to create a more seamless borrower experience between FSA and servicers, eventually allowing borrowers to fully manage their student loans on the StudentAid.gov website.⁹ The National Consumer Law Center (NCLC) released its February 2024 report highlighting potential pitfalls with the USDS implementation, such as FSA's current funding crisis, as well as several accountability and oversight concerns under the new system.¹⁰

How does PSLF fit into the larger ecosystem of the student loan debt crisis?

Despite improvements to the program, accessing forgiveness under PSLF is still a complicated process. Unfortunately, student loan difficulties are not unique to PSLF but are widespread throughout the federal student loan system. As of 2024 (Q2), roughly 43 million Americans hold around \$1.6 trillion in federal student loan debt.¹¹ Since PSLF's inception in 2007, student loan debt has nearly tripled in size, and the number of borrowers has increased by about 15 million.¹² While PSLF has provided relief to some borrowers, it has not resolved the student loan debt crisis in the United States.

Unfortunately, many student loan borrowers are among the most vulnerable populations. Around 9 million borrowers are aged 50 and older and hold around one-quarter of the outstanding debt.¹³ Not only have some borrowers been making payments on their loans for 20 years or more, others have taken on additional debt in the form of Parent PLUS Loans to pay for their children's education due to the skyrocketing cost of higher education.¹⁴ Borrowers in this population working with the SLA are fearful they may have to delay their retirement, face Social Security garnishment, or make payments on student loan debt until they pass away. To apply for PSLF, borrowers must be actively working for a PSLF-qualifying

employer. Therefore, borrowers already retired from public service are unable to access PSLF, even if they served the public for over 10 years.

In addition to being a generational issue, student loan debt disproportionately impacts both people of color and women.¹⁵ Women, on average, have higher rates of enrollment in higher education and take on more student loan debt than men to afford their education.¹⁶

Subsequently, women experience the impact of the gender wage gap on their ability to repay their loans, while women of color also experience the impact of the racial wealth gap.¹⁷ Black women in particular are the most impacted of all student loan borrowers¹⁸ as they face additional hurdles, such as disproportionately taking on educational debt for their children in the form of unfavorable Parent PLUS loans and navigating systemic racism in financial and educational institutions.¹⁹ PSLF, if access and outreach are expanded, has the possibility to greatly benefit student loan borrowers and reduce disparities in gender and racial equity.

Why is state-level advocacy for PSLF important?

State-level advocacy is a key component for increasing access and removing barriers to loan forgiveness for public service employees. For example, Washington and several other states implemented a higher education credit multiplier to provide credit for part-time academic employment, influencing federal adoption of the calculator and helping higher education borrowers across the nation. Joint outreach conducted by OFM and SLA has resulted in increased engagement with Washington public service employers and forged relationships with federal-level partners to help drive changes at the federal level.

Although PSLF is a federal program, states are uniquely positioned to provide advocacy and support to borrowers.²⁰ Washington is one of over a dozen states with a student loan bill of rights codified into law.²¹ Washington's student loan bill of rights creates accountability for student loan servicers and protects student loan borrowers from harm caused by servicer errors.²² Notably, despite several attempts by Congress,²³ there is no federal student loan bill of rights, which makes it critical for states to act in the best interests of their residents.

In addition to consumer protection, state initiatives have the potential to influence ED policy. For example, in 2019, California passed Assembly Bill Number 463 directing community college districts to use a standard calculation to convert hours/credits taught by adjunct faculty to determine full-time standing – and therefore eligibility of employment for PSLF.²⁴ In 2022, Oregon passed a law requiring education employers to notify their employees about PSLF.²⁵ Also in 2022, New York passed a law, similar to California's, to provide definition and direction at the state level for specific elements of PSLF.²⁶ New York's bill also included the creation of a complaint process, allowing borrowers to notify the state if an employer refuses

to sign a PSLF form.²⁷ Elements of these laws are reflected at the federal level under the 2023 final PSLF regulations,²⁸ suggesting that advocacy at the state level can influence policy at the federal level.

While the final PSLF regulations demonstrate some of the changes ED is implementing to improve PSLF, the changes are only effective if borrowers are aware of them. When changes occur, ED may issue a press release and update its webpages, but it does not always directly notify borrowers, instead relying on student loan servicers to communicate information.²⁹ Without receiving reliable direct communication, it is unsurprising that a borrower might not know current requirements and changes applicable to them. States can fill in this communication gap by reaching out directly to borrowers when possible. By regularly communicating with borrowers, state student loan advocacy can fight negative perceptions of PSLF, provide reliable information, and help borrowers achieve PSLF.

Washington PSLF data

Washington state public service employer and employee data

OFM and SLA researched multiple data sources to determine the approximate number of PSLF-eligible employers and employees in Washington state. Based on the information collected, there may be more than 40,000 PSLF-qualifying public service employers with more than 800,000 employees in our state, including registered nonprofit organizations.

The Washington Employment Security Department (ESD) provided the Bureau of Labor Statistics data for Washington government employers.

Figure 2. Average annual employment in WA state, 2023 (revised) ³⁰

Government Employers	Employers	Employees
Federal	141	73,733
State	179	132,606
Local (city, county, Tribal)	1,808	364,673
Total	2,128	571,012

Between the federal, state, and local governments, there were an estimated 2,128 employers with approximately 571,012 employees in 2023 (see Figure 2). State government agencies include departments, offices, agencies, or institutions of state government, the Legislature, institutions of higher education, school districts, and educational service districts. Data for local government includes city, county, and Tribal employers.

OFM and SLA were unable to find a verifiable source of data for qualifying nonprofit employers and employees in Washington. Several data sources were identified, but none included sufficient detail about nonprofit status to predict the number of organizations likely to qualify for PSLF.

Data Source	Available data	Data limitations.
Washington Office of the Secretary of State, registered nonprofit organizations	62,000 organizations	Tax-exempt status not available, no information about services provided
Internal Revenue Service, all tax-exempt organizations in WA ³¹	41,288 organizations	Insufficient detail regarding services
Nonprofit Association of Washington (NAWA), 2022 <i>Nonprofit Economic Impact Report</i> ³²	235,118 employees working in 501(c)(3) nonprofit organizations	No information for other tax-exempt organizations
Student Borrower Protection (SBPC) analysis conducted in 2022 ³³	179,663 public service workers with student loan debt	Estimated number

It would be helpful to have more comprehensive data from FSA to measure the effectiveness of Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024.

Federal PSLF data for Washington

FSA began publishing state-level PSLF data in March 2022. Washington data shows a significant increase in student loan debt forgiveness since the passage of Chapter 248, Laws of 2022. However, data from 2022 to 2024 indicates that PSLF access for Washington borrowers increased at a lower rate than at the national level.

As shown in the figure 3 below, the number of Washington borrowers with processed PSLF discharges in Washington state increased from 3,110 in March 2022 to 20,680 in June 2024. This is an increase of 565% since March 2022, compared to a 703% increase nationwide.

Figure 3. Washington borrowers with processed PSLF discharges (PSLF, TEPSLF, and limited waiver) in Washington state, see [Appendix D](#) for source references.

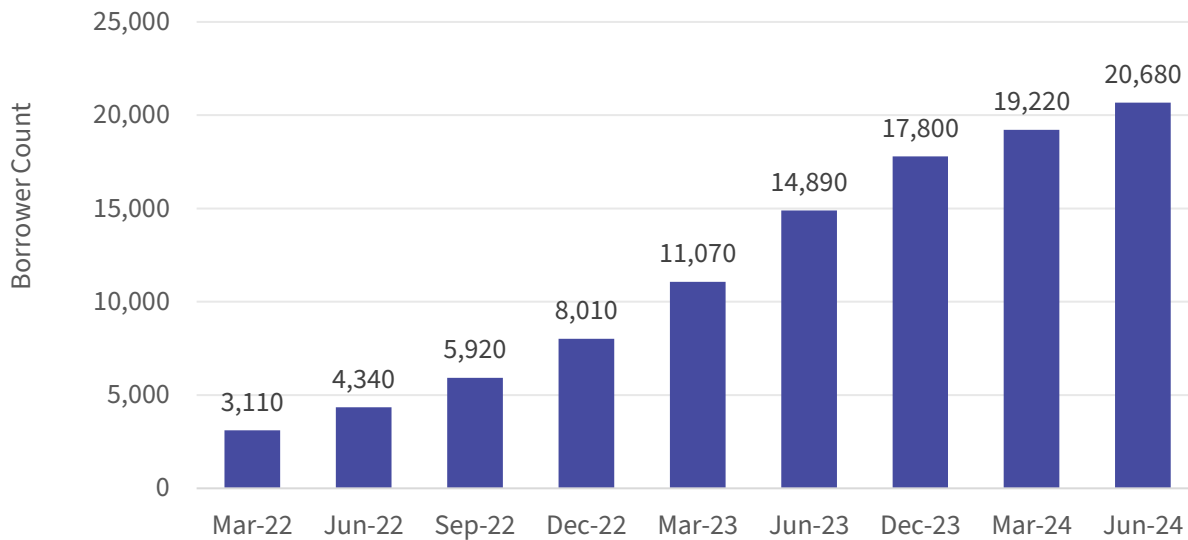
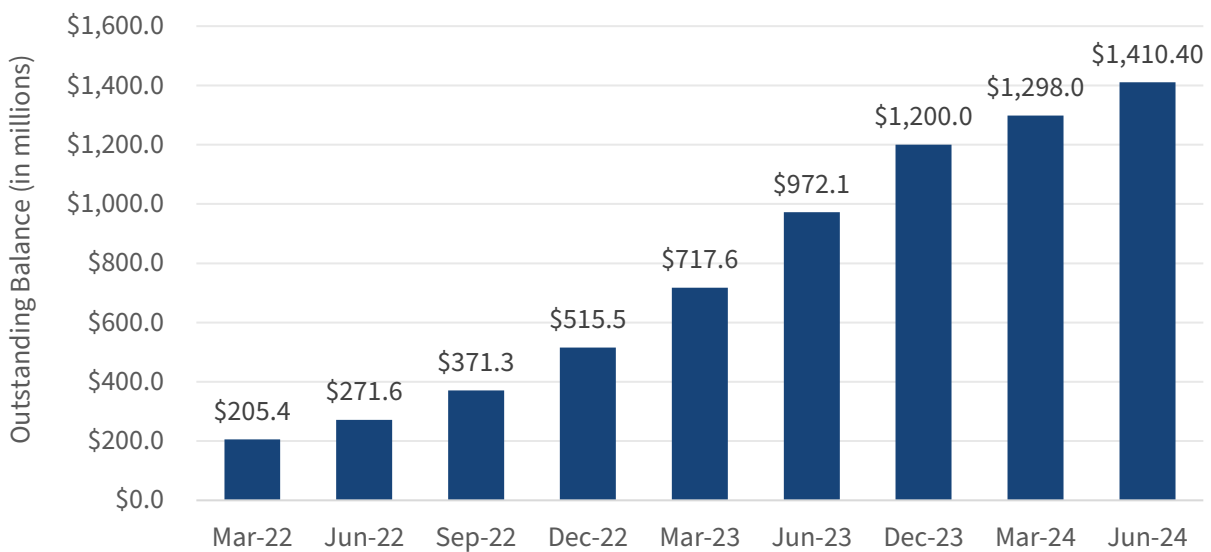


Figure 4 shows that total student loan debt forgiven in Washington state through processed PSLF discharges increased by \$1.2 billion in the last two years, from \$205.4 million in March 2022 to \$1.4 billion as of June 2024. These dollars represent increased financial wellness for the 20,680 Washington borrowers whose loans were forgiven.

Figure 4. Amount of loans forgiven in millions through PSLF (PSLF, TEPSLF, and limited waiver) in Washington state, see [Appendix D](#) for source references.



FSA provides statistics regarding employer certification forms received and student loan type by employer type (government, not-for-profit) at the national level but not at the state level. In addition, FSA does not provide any statistics on loan discharge information by employer type. These data constraints have been discussed with FSA. FSA indicated that, due to a lack of resources, there may be no plans to enhance data reporting. The lack of employer detail in FSA PSLF reporting will pose a challenge to measuring the effectiveness of Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 in increasing access and removing barriers to student loan debt forgiveness for qualifying employer types in Washington.

Washington state government PSLF data

PSLF data reporting is dependent on employer compliance. State government's human resources information system, HRMS, was updated in February 2024 to track employee PSLF data. The initial data fields included the date an employee's employment was last certified for the PSLF program and a PSLF status field to indicate whether an employee has opted into the PSLF employment certification process for Washington state employees. As noted in the following [Summary of Washington state legislation](#) section, amendments to RCW 41.43.045 passed in March 2024 made the PSLF status field unnecessary.

In February 2024, OFM State HR notified state agencies that HRMS had been updated to allow PSLF data tracking for employer certification. In June 2024, OFM State HR notified state agencies of the PSLF statutory changes and provided updated procedures for use of the PSLF data fields in compliance with the statutory changes.

As of June 2024, HRMS data indicates 102 state agencies are tracking PSLF information, and 936 employees have requested PSLF employer certification. OFM will continue to collaborate with the HRMS data stewards group to promote agency use of HRMS for PSLF tracking and reporting for state employees.

Summary of Washington state legislation

PSLF statutes and amendments (Chapter 248, Laws of 2022; Chapter 2, Laws of 2024)

In recognition of the negative impacts created by the burden of student loan debt on public service employees, the Washington State Legislature passed Engrossed Substitute Senate Bill 5847 (Chapter 248, Laws of 2022) to³⁴:

- a) Develop materials to increase awareness of the federal PSLF program.
- b) Create a program for state agencies to certify employment for the purpose of the PSLF program.

- c) Have public service employers collaborate on a statewide initiative to draft a legislative plan to improve access and remove barriers to the PSLF program for all public service employees in the state.
- d) Acknowledge the work done outside the classroom by part-time academic employees, allowing for those hours to be counted towards the definition of full-time for the PSLF program as set forth in 34 C.F.R. Sec. 685.219.

In March 2024, the Legislature passed House Bill 1950, which amended ³⁵:

- RCW 41.04.045 – requiring state agencies to:
 - Send PSLF materials to employees separating from a state agency upon separation.
 - Process employer certification forms submitted via the newly established PSLF Help Tool.
 - Provide annual notices reminding employees to submit the employer certification form.
- RCW 41.04.055 – revising the part-time employment calculation for part-time academic employees.
- RCW 43.41.425 – including the Office of the Superintendent of Public Instruction as a member of the PSLF Statewide Initiative Committee.

While SLA and OFM do not have a mechanism to fully quantify how much communication efforts have helped borrowers since the passage of Chapter 248, Laws of 2022, anecdotal feedback suggests that without the resources, webinars, and outreach done as a direct result of the bill, some Washington state borrowers may have given up on ever receiving forgiveness under PSLF.

“The process felt daunting to take on independently, and though I had tried to apply myself, I had abandoned it due to not hearing anything official back and feeling like that was because I likely did not have the necessary requirements met. Attending a webinar with [the SLA and OFM] helped me to understand the ins and outs a lot better [...]. I would not have completed this process without that crucial help.”

— South Whidbey School District employee, received PSLF for \$42,000

PSLF Statewide Initiative Committee

The PSLF Statewide Initiative Committee was created in accordance with Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 to develop a statewide initiative to improve access and remove barriers to the PSLF program for all public service employees.

The committee is co-led by the OFM PSLF Policy and Performance Analyst and WSAC's SLA Associate Director. While membership has rotated since its creation in 2022, the committee remains engaged and vested in its mission. This committee creates space for development of the PSLF statewide initiative plan, PSLF resources, sharing of state and federal updates that impact the PSLF program, and networking among employer PSLF contacts.

Current committee members include the Governor's Office Executive Policy Advisor for Education & Workforce Development and representatives from ESD; Department of Retirement Systems; Office of the Superintendent of Public Instruction; FSA Ombudsman Office; Office of the Attorney General (AGO); SOS; State Board for Community and Technical Colleges; University of Washington; Department of Enterprise Services (DES); Department of Children, Youth, and Families; Washington Association of Counties; City of Lakewood; Federal Way Black Collective; Washington Indian Civil Rights Commission; Washington Education Association; Washington State Professional Educator Association; and Washington Finance Officers Association.

PSLF Committee work activities:

- Identification and follow-up with interested parties to develop the plan for and continue work on the statewide initiative
- Logistics for roll out of PSLF employer resources
- Development and updates to PSLF eligibility letter templates, PSLF frequently asked questions, PSLF guidance for state agencies, and resources for local governments
- Development of the state employer directory
- Development of the PSLF project charter
- Distribution of PSLF information to their organizations and employees

PSLF Committee input:

- Feedback regarding implementation of Chapter 248, Laws of 2022
- Learning objectives for employer webinars
- Input for proposed legislation enacted as Chapter 2, Laws of 2024 and implementation feedback
- Testified in support of HB 1950 during 2024 legislative session
- PSLF employer requirements and best practices
- Solutions and PSLF guidance for issues encountered with the FSA transition from hard-copy employer certification forms to the electronic DocuSign process
- Outreach to school districts and educational service districts, retirement programs, and nonprofit employers
- PSLF tracking in HRMS

- Data sharing agreements with FSA
- PSLF employer and borrower surveys
- PSLF Statewide Initiative Plan (this report)

PSLF outreach to date

Outreach to Washington state agencies

OFM's plan for increasing awareness and access and removing barriers to the PSLF program began with development of employer guidance and creation of a statewide web page to house PSLF resources. To increase awareness, we conducted outreach to state agencies and higher education institutions. To remove a significant barrier to PSLF experienced by employees, agencies and higher education institutions were asked to provide OFM with the name of their designated PSLF contact and the email address employees should use for submission of PSLF employer certification forms.

We used this information to establish the [PSLF state agency and public higher education employer directory](#) included on the [OFM PSLF website](#). The website also includes a program overview, list of state agencies who must follow program requirements, PSLF statute links, state agency guidance on program notification and certification requirements (including employer letter templates and an overview of the employment certification process), ED and SLA resource links for employers and employees, ED statistics for Washington PSLF student loan borrowers and PSLF loan discharges, and links to PSLF webinars offered by OFM and SLA.

OFM's next step in the plan was to begin outreach to state agencies. An initial interactive webinar for state employers, called an HR Lunch and Learn, was offered to PSLF contacts in May 2023. The presentation was followed by a question and answer (Q&A) session. The event was recorded, and a link was posted to the OFM PSLF website to broaden awareness for state agencies.

OFM used notes from the HR Lunch and Learn Q&A session to develop a frequently asked questions (FAQ) document to increase employer awareness of the PSLF program. The PSLF FAQs highlight state program requirements and implementation date, general information about PSLF, and action items for scenarios employers are likely to encounter.

To further expand awareness of PSLF certification and notification requirements for state agencies and related resource materials, OFM sent an email communication highlighting the HR Lunch and Learn web link and employer PSLF FAQ to all state agencies and school district administrators.

Employer webinars

OFM's plan to increase awareness and access and remove barriers includes ongoing virtual PSLF employer presentations. To date, OFM and SLA have conducted presentations for multiple Statewide HR Manager monthly meetings, as well as for the Washington State Personnel Association and HRMS Data Stewards. Additional HR Lunch and Learn webinars were offered in July 2023 and July 2024. These presentations included PSLF program requirements for state agencies with an emphasis on Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 requirements; PSLF tracking requirements, including the new tracking feature in the state's HRMS system; updates of federal-level PSLF program changes; and Q&A sessions focused on removing barriers and expanding access for Washington state employees. OFM will continue to provide PSLF HR Lunch and Learn webinars annually along with specific presentations as needed to address identified program barriers and maintain awareness of state and federal program updates.

For ongoing awareness amongst the state agency community, OFM posts links to PSLF virtual employer events and presentation materials on the OFM PSLF website. Following each virtual PSLF event, OFM emails the recording, presentation slide deck, and other materials to all event registrants, the HR Managers listserv, the HRMS Data Steward distribution list, and to OFM's PSLF distribution list.

Email outreach

To further increase awareness, improve access and remove barriers to the PSLF program, OFM conducted email campaigns to Washington state agencies which include departments, offices, agencies, institutions of state government, and the Legislature. OFM also reached out to published contacts for school districts and educational service districts. The communications provided an overview of the PSLF program and focused on state agency requirements for compliance with Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024. These emails also included web links to employer notification letters, SLA PSLF website, OFM PSLF website, FSA website, PSLF Help Tool, WSAC complaint portal, fact sheets, and frequently asked questions.

Recipients of the email campaigns and PSLF points of contact were invited to join OFM's PSLF distribution list. The list currently includes 159 members and is used for ongoing PSLF communications, including updates to PSLF employer template documents, fact sheets and frequently asked questions, outreach event notifications, and FSA PSLF updates.

Targeted state agency outreach

One key barrier identified is that people wait to apply for PSLF until after they have left public service, at which point they are no longer eligible to apply. To increase access and remove this barrier to the PSLF program, OFM reached out to all the public service retirement programs in Washington state to ask that they include language in their retirement communications reminding employees to apply for PSLF before they retire.

OFM State HR worked with DRS to improve access and remove barriers to the PSLF program by including it as an item on their Retirement Planning Checklist. DRS has also added a slide to their Nearing Retirement Seminar presentation reminding employees to apply for PSLF before they retire.

OFM State HR also worked with the State Board for Community and Technical Colleges, as well as public universities, who have all confirmed they have added language about PSLF to their retirement webpages, checklists, and presentations.

School district outreach

OFM used published school district and educational service district contact lists to source email addresses for the PSLF email campaign and was unable to confirm a PSLF point of contact for each of Washington's school districts and educational service districts. Due to the lack of available contact information, we have not been able to establish an employer directory to include on the OFM PSLF website. In August 2024, OFM and SLA met with contacts for OSPI and the Washington Education Association to discuss options to ensure timely distribution of PSLF program information; Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 requirements; and identifying PSLF points of contact to process employer certification forms. Conversations are ongoing and OSPI has offered to serve as a liaison for OFM until there is a documented PSLF point of contact for each school district and educational service district.

Outreach to other PSLF-qualifying employers

In-person outreach

SLA and OFM staffed a vendor booth at the 2023 Nonprofit Association of Washington Conference. Marketing materials included an overview of the PSLF program, employer qualifications, links to SLA and OFM employer and employee resources, and a QR code linking users to the SLA and OFM websites.

Email outreach

SLA maintains an email list of employers who have opted in to receive information about PSLF and, as of July 2024, this distribution list has 182 subscribers and is a mix of local government and nonprofit employers. Employers are notified when we update our PSLF employer template documents (at least annually) and have other related PSLF information to share. In addition to our mailing list, SLA has also done targeted email campaigns to Washington nonprofits and local government agencies.

In December 2023, a list of all registered nonprofit organizations in the state was obtained from the SOS. The list included information for approximately 62,000 organizations. An email was sent in May 2024 to 49,671 valid email addresses from the SOS list. For local government, human resource contacts were identified at Washington's 39 counties, and an email went out to each contact in July 2024. A similar notice was shared with the Association of Washington Cities (AWC) and distributed via its monthly HR newsletter to Washington's 281 city governments. Each of these email campaigns included a notice of their organization's potential PSLF eligibility and information regarding SLA PSLF resources (Fact Sheet, FAQs, template letters) in accordance with the requirements outlined in RCW 28B.77.009.

Webinars

Feedback received from public employers and the PSLF Statewide Initiative Committee in 2024 identified a gap in employer knowledge about the PSLF program, specifically among the employers who are not currently required by state law to notify employees (local, federal and Tribal governments, as well as qualifying nonprofit organizations). As a result, two new presentations were piloted, one targeted to local government employers and another one for nonprofit employers.

SLA and OFM led the first local government employer-targeted webinar to the Washington Association of County Officials (WACO) in August 2024. WACO has at least one representative from each county in Washington state. The webinar focused on sharing PSLF resources for employers and employees (including the materials developed from Chapter 248, Laws of 2022), explaining how local government employers can help their employees access PSLF, and how PSLF can be used as a low-investment tool to recruit and retain public employees.

In addition, SLA and OFM conducted the first nonprofit employer-targeted webinar to the Nonprofit Association of Washington (NAWA) in September 2024. This webinar shared some of the information included in the local government webinar and included a section specifically for nonprofits who are not tax-exempt under section 501(c)(3) of the federal tax code. The PSLF program treats eligibility for those nonprofits differently; while 501(c)(3) nonprofits are always eligible for PSLF, other types of nonprofits only qualify for PSLF if they

are providing certain qualifying services. As a result, employers may need to initially provide their employees with additional documentation for the nonprofit to become a PSLF-qualifying employer. This webinar provided guidance on what documents employers can give employees to facilitate that approval process.

While these two pilot presentations may serve as a foundation, further outreach is needed so that non-state-government employers are aware of the recruiting benefits of PSLF and understand best practices to support their employees in achieving PSLF forgiveness. Similar, tailored presentations may be created for Tribal governments located in Washington state. Creating, updating, and presenting the material to each intended employer type and borrowers is time intensive, and the current SLA staff assigned to perform this work does not have the capacity to do this needed outreach. Therefore, ensuring appropriate budget allocation to hire additional outreach staff is essential to increase access to the PSLF program in Washington.

Outreach to other retirement systems

OFM has also done outreach to the cities of Seattle, Tacoma, and Spokane, which run their own retirement programs, to recommend that they add language about PSLF to their retirement resources. There is a need to continue to work with these cities to confirm that they have included these reminders about the PSLF program in their retirement resources. There is also a need for continued outreach to other public service retirement programs across Washington state to add a PSLF application reminder for retiring employees before they leave public service, thereby losing eligibility for the program.

Outreach to Tribal governments

OFM continues to explore avenues best suited to reach Tribal leaders. In the meantime, OFM reached out to the Department of Social and Health Services' Senior Director of the Office of Indian Policy. The senior director agreed to assist by forwarding an initial letter and PSLF information to Tribal leaders and representatives for home and community services. OFM, SLA, and DSHS are currently collaborating on this effort.

Outreach to borrowers

Email outreach

In response to direct requests from borrowers and the PSLF Statewide Initiative Committee, in June 2023, the SLA created a mailing list to share updates and information directly with Washington student loan borrowers interested in PSLF. As of July 2024, our PSLF borrower mailing list had 4,264 unique subscribers. Our email outreach has also been an effective way to inform borrowers about our PSLF webinars.

Webinars

Since October 2022, SLA in partnership with OFM has presented over 14 live, public webinars about PSLF. In addition, SLA and OFM also presented to specific agencies and organizations as requested, including the Department of Commerce, the Nonprofit Association of Washington (NAWA), the Rainbow Alliance and Inclusion Network (RAIN), the Human Resource Management Commission (HRMC) for the Washington Association of Community and Technical Colleges (WACTC), and the Washington State Microenterprise Association (WSMA).

“I attended a student loan webinar. This alerted me to the fact that my [sic] Mom could be eligible for PSLF for her parent plus loans through her nonprofit job [...]. With the info the Office of the Student Loan Advocate provided I was able to walk her through the steps and her loans have since been forgiven. I also told my partner to register [...]. So three people guided through the process by the office.”

— Employment Security Department employee

Between 2022–2024, over 2,000 borrowers attended our live webinars open to the public, and the corresponding presentation recordings posted on YouTube have combined for more than 3,400 total views as of July 2024. The live webinars focused on a borrower’s perspective and on demystifying the PSLF program requirements, including explaining the application process and educating borrowers on updates to the program. Data from surveys we conducted after presentations suggests that webinars are highly effective tools to educate borrowers about PSLF (see [Appendix B](#) for full distribution):

- A combined total of 88% of survey respondents said they “Agree” or “Strongly agree” with the following statement: “Because of this workshop, I now know the requirements for the PSLF program.”
- A combined total of 86% of survey respondents said they “Agree” or “Strongly agree” with the following statement: “Because of this workshop, I now know how to certify employment & apply for PSLF.”

Webinars create an opportunity for many borrowers to learn about the PSLF program at once, and the ability to make the recorded content available on YouTube allows for those who cannot attend the live webinar an opportunity to learn the material on their own. In addition, we have intentionally allocated time at the end of each webinar for borrowers to ask questions, allowing them to get general questions answered in real time.

However, both the PSLF Statewide Initiative Committee and our employer survey showed some accessibility concerns about our webinars. Copies of the presentation slides and auto-generated close caption transcripts were provided to participants and posted on our website with the webinar recordings. OFM is exploring options to provide American Sign Language (ASL)

interpretation or revised close captions for presentations. Another concern raised is the availability of presentation materials and live presentations in languages other than English (i.e., Spanish). Ensuring our presentation materials and format is accessible will allow for all eligible Washington state borrowers to access the information they need to qualify for the PSLF program.

In-person outreach

To date, most of our borrower outreach has been virtual, due in part to the COVID-19 pandemic and resource limitations, but since 2021, the SLA attends the Public Service Recognition Week (PSRW) event held annually in Olympia to share information regarding their availability to help borrowers across the state. Historically held in the first week of May, PSRW was created to honor those who serve our nation as federal, state, county, and local government employees.

Starting in 2023, OFM joined the SLA team, and we began distributing physical copies of the materials created in response to Chapter 248, Laws of 2022, specifically the PSLF Fact Sheet and PSLF Frequently Asked Questions document. SLA and OFM representatives spoke with numerous borrowers about the value of PSLF and answered questions regarding the program. Several attendees shared appreciation for state-level support in navigating PSLF, especially being able to talk to a real person.

It has been brought up by borrowers, employers, and the PSLF Statewide Initiative Committee members that in-person outreach creates visibility, trust, and connections in a way that virtual environments struggle to emulate. As COVID-19 restrictions have been lifted and recognizing the value of in-person outreach, both OFM and SLA would like to continue expanding in-person engagement opportunities. However, building staff capacity will be needed to comprehensively conduct in-person outreach to borrowers and employers.

Data from surveys

In July and early August 2024, SLA and OFM conducted PSLA employer and borrower surveys. Employers who were part of SLA and OFM's current databases were asked to distribute the employer survey to staff responsible for completing employer certification forms and to share the borrower survey with their employees. In addition, SLA shared both surveys through WSAC's social media channels. OFM also requested the state enterprise Business Resource Group leaders to distribute the borrowers survey to their membership.

Borrower survey

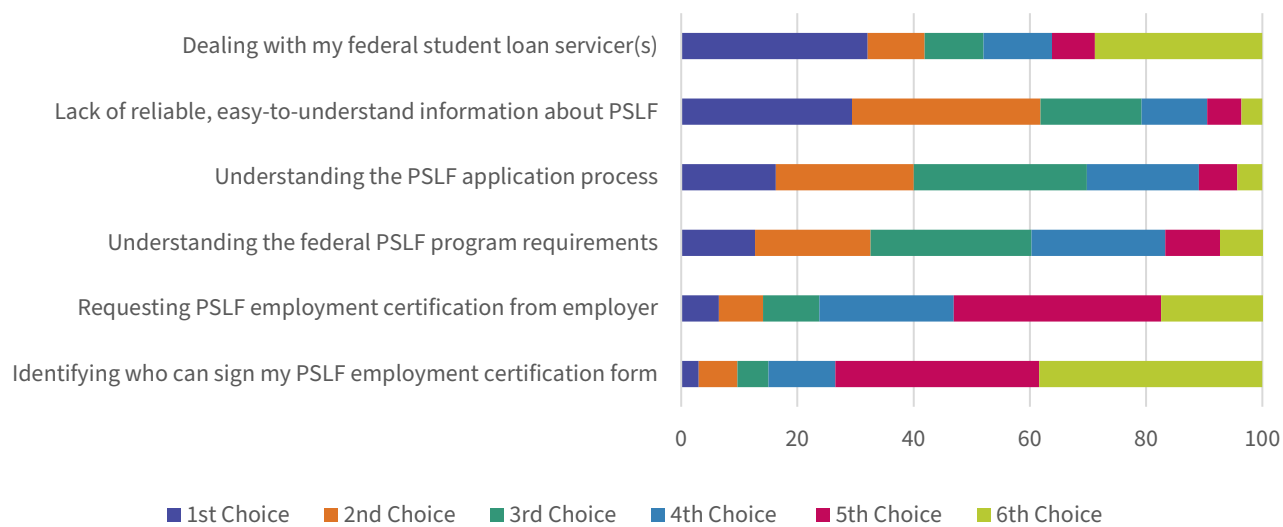
SLA and OFM conducted a survey targeting Washington state borrowers working in the public sector to gain insight on their experience with the PSLF program. We had a total of 1,706 respondents who indicated they were either Washington state residents or worked in a public sector employer located in Washington state. Most respondents (91%) worked in Washington state government, including public institutions of higher education (see [Appendix C](#) for full distribution). This could be an indication that outreach to state agencies has been successful in sharing PSLF information with state employees. On the other hand, outreach efforts need to be increased with Tribal governments, local governments, school districts/educational service districts, and nonprofits.

About 68% of survey respondents identified as white, roughly 25% of respondents identified as being one or more races, and 7% chose not to respond to the question (see [Appendix C](#) for full distribution). This suggests that more outreach is needed among communities of color, who typically carry higher student debt loads when compared to their white counterparts and are therefore poised to benefit significantly from PSLF.

We asked respondents to rank their biggest challenges when it comes to PSLF. The options available on this question were based on challenges the SLA identified as common through our requests for assistance, as well as feedback received from the PSLF Statewide Initiative Committee. The challenge ranked first overall was dealing with federal student loan servicers (32% of respondents), which indicates a persistence in Washington student loan borrowers experiencing issues working with their servicer to achieve PSLF.

Meanwhile, when combining the first and second choices, roughly 62% of respondents selected lack of reliable, easy-to-understand information about PSLF as their biggest barrier, suggesting that the resources SLA is creating for borrowers about the PSLF program can be improved to be more relevant and comprehensible. Finally, requesting PSLF employment certification from employers and identifying who can sign the PSLF form was ranked as the least important barriers among respondents. This suggests that state agency outreach has been successful in resolving these issues, since most of the respondents indicated they were employed in Washington state government.

Figure 5. Participant-Reported Challenges with PSLF, Ranked



To identify other issues beyond the options on the previous question, we asked respondents to list any other challenges they faced in accessing the PSLF program. We noticed several challenges as consistent trends among the qualitative responses:

- I. Borrowers faced significant problems in accessing the program over the years and decided to pay off their loans instead, sometimes taking extreme measures that might hurt their financial well-being, like selling their house or taking money from retirement.
- II. IDR payments may be too high to allow borrowers to access PSLF and would lead to no forgiveness after 10 years of repayment. This is especially the case among Parent PLUS borrowers with limited affordable IDR repayment options.
- III. Forms required to achieve PSLF forgiveness (e.g., employment certification, IDR, and consolidation applications) take too long to be processed. There is also a lack of clear communication from servicers and FSA about each step of the PSLF process, and borrowers experience months and even years of uncertainty about their potential PSLF eligibility and forgiveness timeline.
- IV. There is a general lack of trust in the ability to access PSLF after 10 years. Borrower reservations included poor former program performance, fears that PSLF information might be lost during servicer and website transitions, and repeated mentions of the current Saving on a Valuable Education (SAVE) litigation and its impact on PSLF borrowers. The uncertainty of forgiveness affected the ability of borrowers to make financial and professional long-term decisions.

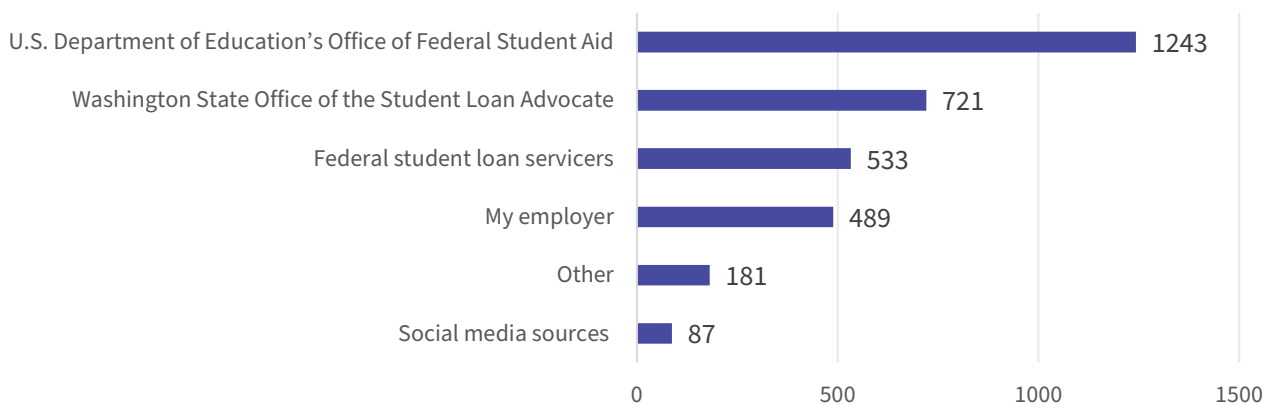
“I’ve heard horror stories of people getting to the end of their 10 years, and their loans don’t get forgiven due to logistical mistakes in the application/enrollment process... I don’t want that to be me.”

—PSLF Borrower Survey Participant

While most of these challenges can only be addressed by program improvements at the federal level, there are opportunities at the state level to overcome some of these barriers. Ensuring the SLA is appropriately staffed to address any logistical issues in the PSLF application and enrollment process will be needed to ensure borrower complaints are addressed appropriately and in a timely manner. In addition, SLA and OFM should continue to educate the public about PSLF — including highlighting the increased rates of PSLF forgiveness for borrowers across the state in the past few years — to overcome borrower fears associated with past program performance.

When it comes to receiving PSLF information, roughly 73% of respondents indicated ED’s FSA Office to be a trustworthy source of information. That means one-fourth of survey respondents do not trust PSLF messaging coming directly from FSA. State advocacy and outreach alongside ED may help to bridge this gap to provide another reliable source of easy-to-understand information about PSLF. Surprisingly, only about one-third of respondents consider their employers to be trustworthy messengers of PSLF information. This suggests that public service employers have an opportunity to play a significant role in sharing critical PSLF information and encouraging their employees to utilize PSLF as a benefit.

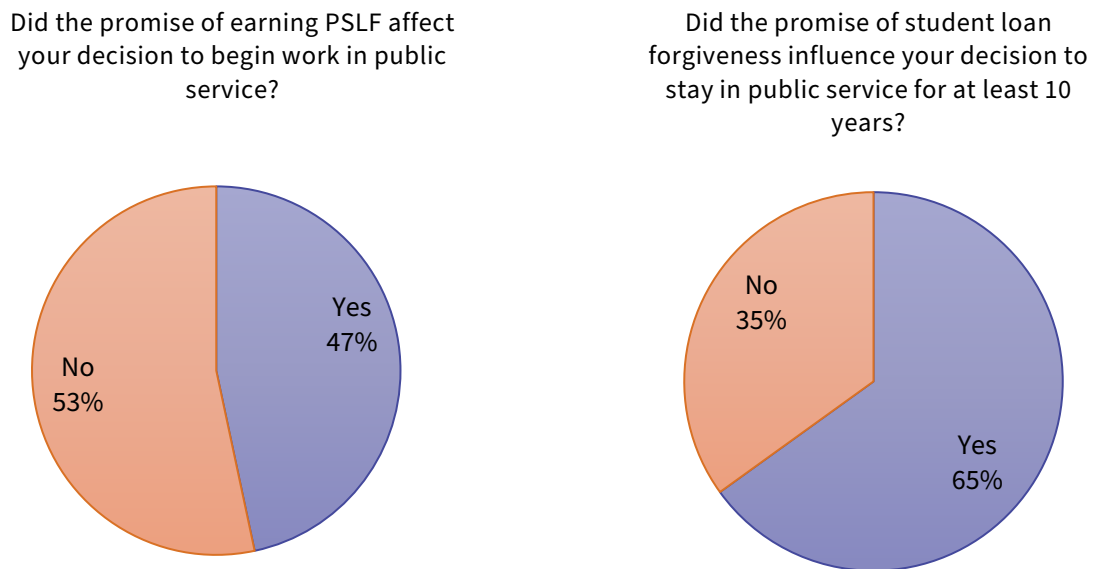
Figure 6. Trusted Sources for Information About PSLF



Finally, survey results support that PSLF may be an effective tool in both recruiting and retaining employees for jobs in the public sector. When asked if PSLF affected their decision to begin work in public service, nearly half of all respondents responded “yes,” suggesting that PSLF is drawing folks towards public service professions as intended. This is promising to

the idea that PSLF information is critical for prospective employees to learn as a benefit to public service employment. Likewise, despite concerns over PSLF’s viability and confusion about requirements demonstrated in the answer to other questions in the survey, 65% of respondents noted that the promise of student loan forgiveness was influential in their decision to stay in public service.

Figure 7. Influence of PSLF on Public Service Career Decisions



Employer survey

SLA and OFM also conducted a survey with PSLF employers to better understand their experiences, perceptions, and knowledge of the PSLF program. The survey generated 116 responses from public employers who indicated that they were located in or had locations within Washington. These respondents also indicated that they were either authorized to sign PSLF forms or worked in a human resource capacity. About 51% of survey respondents indicated that they worked at state agencies, followed by 37% at nonprofit organizations. Overall, the numbers in the survey are not fully representative of the distribution of public service employers across Washington state (see [Appendix B](#) for full distribution). The low number of responses among other types of employers is indicative that additional outreach and work needs to be conducted to other PSLF-qualifying employers in the state to engage them as active participants in helping their employees access PSLF.

Our survey participants came from a variety of organization sizes, ranging from 0–25 employees all the way to over 1,000 employees. Among employer respondents, roughly 92%

reported at least some familiarity with PSLF. This finding suggests that SLA and OFM may have been successful in educating employers about the PSLF program, especially state agencies. However, the goal should be for every public service employer to be very familiar with the PSLF program and employment certification process, so they can successfully guide their employees who demonstrate interest in the program.

Figure 8. Familiarity with the PSLF Program

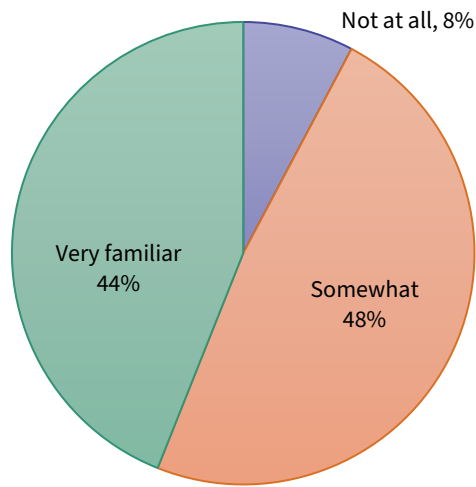
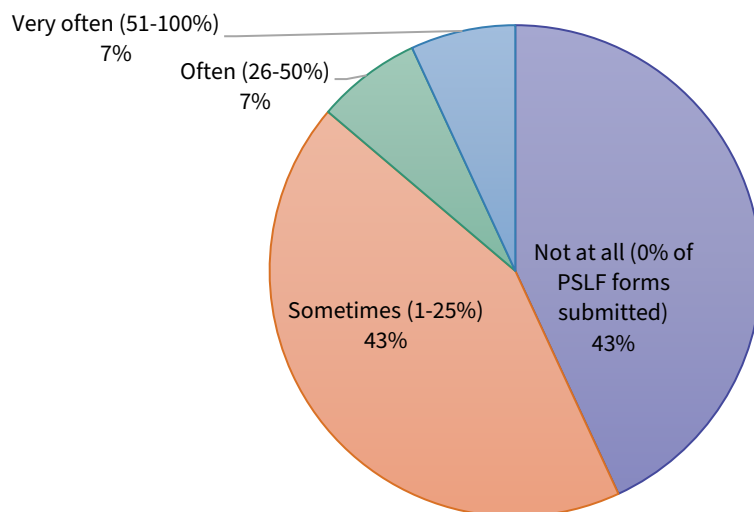


Figure 9. Frequency of Issues with Completing and Processing PSLF Forms



About 86% of respondents reported running into issues less than 25% of the time when completing PSLF forms. This suggests that FSA's PSLF Help Tool may have resolved many of the historic problems employees and employers had in getting their PSLF form signed. We also followed up on this question by asking employers which problems they encountered when completing PSLF Forms, and we identified the following as common issues:

- **PSLF Help Tool**

- Unable to edit information on the PSLF form, including employment dates, incorrect EINs, incorrect addresses.
- Early DocuSign expiration, despite the original message explaining to employers that they have 60 days to complete the form.
- Not receiving the pin needed to access DocuSign.

- **PSLF Process**

- An agency or organization incorrectly showing up as an ineligible employer.
- The inability to list multiple end/start dates on one form when there is a break in service. Requires the employee to submit multiple forms, and therefore requires the employer to sign multiple forms, to address each break in service.

These issues are primarily problems with the PSLF Help Tool, the PSLF Form, or the PSLF application process and can only be resolved with improvements at the federal level. However, some of the other issues identified (e.g., understanding how to handle employee leave or getting employee's contact information from the DocuSign feature), suggests an overall employer lack of knowledge with how to use the DocuSign feature and the PSLF application process more generally. These issues could be addressed by additional education and outreach by the PSLF statewide initiative program, such as creating additional guides or webinars targeting these employer questions.

Most of the employers that responded to the survey are already taking steps to raise awareness about PSLF, as roughly 80% indicated that their agency or organization currently notifies employees about the PSLF program. Among the approximately 20% of remaining employers who do not currently notify their employees, some mentioned they believed their employees are already aware of the program from other sources, while others believe the program does not seem relevant to some or all of their employees. This sentiment regarding overall program relevancy for employees can also be seen when we asked survey respondents who act in a hiring capacity to rate how helpful PSLF was in assisting with recruitment.

We asked employers to rate on a scale of 1–5, with “1” being not at all, “3” being neutral, and “5” being absolutely, whether PSLF helped them with recruitment, and the average response

was 2.1, meaning, most surveyed employers don't believe the program helps much with recruiting. This perception of the value of PSLF in the hiring/recruitment process clashes with data from the PSLF borrower survey about the influence PSLF has on employees' decisions to begin working in public service or stay in public service.

We also asked respondents if there were any other resources they would find helpful to share with their employees about PSLF. Several responses included the creation of brochures, flyers, or workplace posters, suggesting that SLA and OFM could create this additional resource and make it available to employers. In addition, some mentioned the availability of PSLF information in different languages could be helpful to their employees.

Strengthening PSLF in Washington

Moving forward, OFM and SLA will partner with the SOS, DFI, ESD, L&I, and DOL to conduct research and explore recommendations for oversight of a statewide employer certification program for non-state government organizations and methods to identify PSLF-eligible nonprofit employers. This group may collaborate on other data and process issues to improve access and remove barriers to the PSLF program.

Continuing Efforts to Expand PSLF Access

OFM and SLA will continue their efforts to expand PSLF access in accordance with Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024. These objectives are ongoing and do not require additional budget allocation or legislative action.

OFM PSLF resources and training materials

OFM will continue sending updated PSLF materials to state agencies and updating employer guides and the OFM PSLF website to address PSLF program requirement updates, FSA and SLA updates, and new or recurring questions from state employers and state employees.

OFM will enhance the State Employer Directory to include non-state government employer information upon request from the employer. This will increase access to the information needed by public service government employees to submit an employer certification form.

Continued OFM outreach to state agencies

Virtual Outreach Events

OFM will offer a PSLF Lunch and Learn on an annual basis. It will also offer virtual PSLF

employer outreach events as requested by the Washington Personnel Payroll Association, HRMS data stewards, and state agencies beginning in January 2025.

SmartHealth Tile

OFM has established a point of contact with the Washington Health Care Authority to pursue a PSLF SmartHealth tile. The purpose is to expand awareness of the PSLF program and improve financial wellness for qualifying student loan borrowers in state service.

Training in The Learning Center

OFM proposes to create a PSLF webinar available via the DES Learning Center. It will be an on-demand video available to employees. Agencies may also use it for new employee orientation and as a recruitment and retention tool. The purpose is to expand awareness of the PSLF program.

Continued SLA outreach

SLA, in partnership with OFM, plans to continue offering PSLF webinars targeting borrowers on a quarterly basis, with the contingency to add more webinars as relevant changes happen at the federal level regarding PSLF. SLA will continue to strive to share webinar information with borrowers using the PSLF Statewide Initiative Committee, with a particular focus on sharing webinar information with borrowers employed by local and Tribal governments, as well as nonprofit organizations in Washington.

SLA will also work on updating materials required by Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024 (e.g., PSLF employer notification letters, fact sheets, and frequently asked questions documents) as relevant updates happen at the federal level of the program. In addition, SLA will revise each of these resources to make them more engaging and intuitive for borrowers pursuing PSLF in collaboration with members of the PSLF Statewide Initiative Committee. Finally, the SLA (in coordination with OFM, SOS, local governmental entities, and other relevant agencies and public service employer entities) will continue to work on distributing these updated materials and resources to public service employers across the state.

The SLA plans on continuing to grow enrollment in our PSLF borrower and employer mailing lists, with the goal of sharing timely PSLF updates and updated webinars, acknowledging that the federal student loan landscape is in constant change. Borrowers need up-to-date information to make decisions on how to best manage their student loans, and employers should be aware of changes impacting their role and ability to facilitate the PSLF process for current and prospective employees. In addition, the SLA, in partnership with OFM, will continue conducting webinars for non-state-government employers in a very limited capacity, specifically to educate them on best practices to support their employees' enrollment in the PSLF program.

Findings

Ongoing, Reliable Information Is Needed

This section highlights PSLF program issues that have created barriers to Washington student borrowers in achieving student loan forgiveness. These issues are the basis of the report's policy recommendations for statutory changes to create additional student borrower consumer protections and additional resources to ensure SLA staff are available to provide support to student borrowers in a timely way.

Until very recently, PSLF suffered from flawed implementation and oversight at the federal level. Historically, student loan servicers have failed to provide adequate information about the program rules to borrowers, leading to a very small number of applicants being approved once the program reached its 10-year anniversary date in 2017.³⁶ Prior to October 1, 2021, only 7,000 borrowers were approved for student loan forgiveness.³⁷

Borrowers were often informed after many years of public service employment that they had the wrong type of loans, were in the wrong type of repayment plan, were employed at a nonqualifying employer, or that the wrong person signed their employment certification form. In other words, complex rules and flawed administrative processes have made it difficult for borrowers to navigate the requirements of the PSLF program, creating a general mistrust of the program's ability to deliver on its forgiveness promise.³⁸

Since 2017, ED has implemented several changes to the PSLF program, some temporary and some permanent, leading to a significant increase in borrowers who have been able to access PSLF across the nation. However, borrowers often remain confused about requirements and the application process. This is due, in part, to misinformation spread by student loan servicers and third party relief companies about student loan forgiveness programs.

A supervisory report released by the Consumer Financial Protection Bureau (CFPB) in 2024 revealed that servicers engaged in deceptive acts or practices by providing inaccurate information regarding which forms consumers should submit to qualify for certain loan programs. Furthermore, heightened scammer activity, such as third party relief companies, further confuses the borrowers about their repayment and forgiveness options, such as PSLF. The 2023 CFPB Consumer Response Annual Report highlighted that several complaints the CFPB received mentioned scams in which the borrower was promised loan forgiveness.³⁹

The changing landscape of PSLF program rules and limited-time opportunities, combined with misinformation from servicers and scammers, creates a perfect storm of barriers to

borrowers with limited or no access to accurate information about the PSLF program and their eligibility or enrollment status.

At the federal level, FSA has been attempting to address these issues, including shifting away from a single servicer responsible for managing PSLF to a system where digitally signed PSLF applications submitted through the PSLF Help Tool are automatically processed by FSA's systems. Manual processing of PDF or paper applications and customer service are instead provided by Business Process Operations (BPO) vendors, who are often also student loan servicers. The initial transfer from MOHELA to a combined FSA/BPO management of the PSLF program in June 2024 has led to confusion among borrowers and delays in PSLF form processing and forgiveness. It remains to be seen whether this transfer will ultimately benefit borrowers pursuing PSLF and reduce requests for SLA assistance.

Finally, for the past few years, legal challenges to other types of loan forgiveness and Income-Driven Repayment (IDR) plans create further doubt and confusion among borrowers regarding their ability to achieve PSLF. In June 2023, the U.S. Supreme Court blocked the one-time student debt relief program, coined as the broadest forgiveness program to date. While this did not impact PSLF eligibility, it renewed fears among borrowers that PSLF could be subject to similar attacks. Legal challenges impacting the new SAVE IDR plan have also surfaced, leaving thousands of PSLF borrowers in limbo regarding their current or future eligibility for PSLF, as most borrowers need to sign up for an IDR plan to achieve PSLF forgiveness. Support provided by SLA gives borrowers insight to discern the potential impacts of court decisions, relieving uncertainty and doubt regarding their ability to achieve loan forgiveness through PSLF.

Based on the SBPC analysis conducted in 2022, in Washington state fewer than 16% of the estimated 179,663 public service workers with student loan debt had filed paperwork to track their progress toward debt cancellation under PSLF. At that time, the program had resulted in the discharge of only 3,460 Washington student borrowers' debts, less than 2% of the estimated eligible population.⁴⁰ As of June 2024 only 20,680 Washington state borrowers had received PSLF, representing a little over 10% of the estimated eligible population. While this represents a significant increase in borrowers approved for loan forgiveness, a lot of work remains to enable the remaining 90% of Washington state borrowers to access PSLF.

Resource Allocation for the Student Loan Advocate (SLA)

“[...] after 18 months of following up with MOHELA and FSA, and submitting formal complaints to both, I finally reached out to the Student Loan Advocates. [sic] THEY are the reason I have PSLF. With their help I've finally joined the growing group of people who got [PSLF] forgiveness.”

—Meg, federal government employee, Department of Veterans Affairs

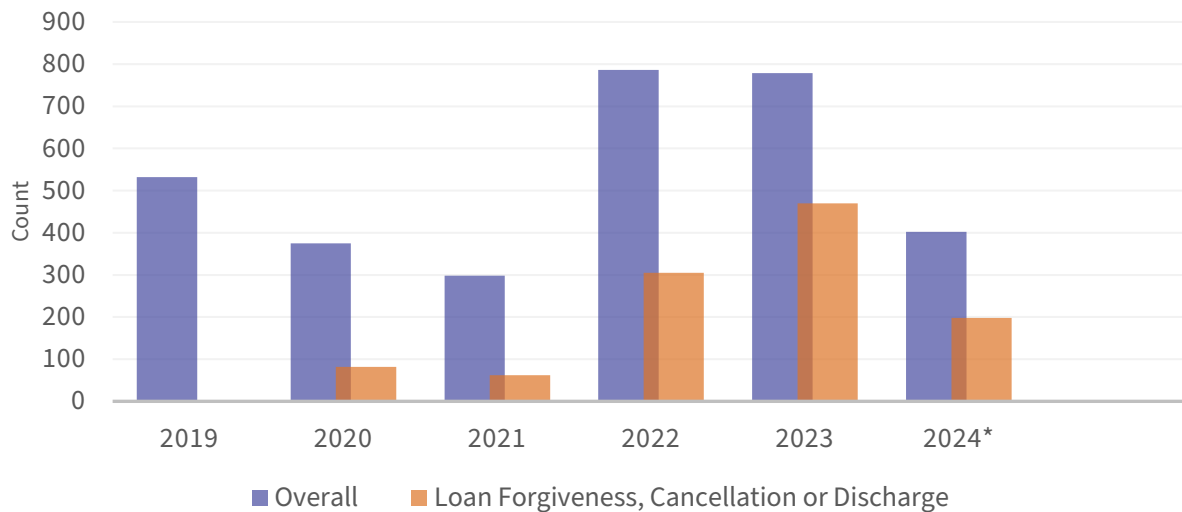
Complaints and Requests for Assistance to the SLA

The Washington Student Complaint portal, implemented in 2019, allows Washington student borrowers to make a complaint or request general student loan assistance from SLA. The portal is used by four state agencies and allows students and borrowers to make a complaint about their school, training program, or student loans. The portal also enables students and borrowers to submit a quick question about their student loans. This tool allows the SLA to collect useful information from the borrowers and track the progress of a request for assistance from receipt to resolution. Since 2020, 34% of borrowers using the portal contacted the SLA to make a complaint, while 57% had questions about their student loans.

This portal is a critical tool for providing relief to student borrowers experiencing barriers to the PSLF program. From December 2018 through September 2024, the SLA has provided guidance and assisted over 3,172 borrowers. Since 2020, requests related to student loan forgiveness represent almost a third of all requests received and have consistently represented the largest share of overall requests each year.

The number of requests for assistance submitted to the SLA has fluctuated over the years, trending upward following state and federal student loan policy changes, and outreach events hosted by SLA. Chapter 248, Laws of 2022 took effect on March 30, 2022, and has contributed to an increase in overall requests for assistance to SLA. SLA experienced a 163% increase in overall requests for assistance from 2021 to 2022, and a 391% increase in requests for assistance about loan forgiveness. Though the overall number of requests for assistance in 2023 decreased slightly compared to 2022, the number of requests for assistance about loan forgiveness experienced an increase of 54% between 2022 and 2023. Additionally, 2024 requests for assistance are on trend to surpass pre-Chapter 248, Laws of 2022 annual numbers.

Figure 10. SLA Requests for Assistance



**Data as of September 2024*

SLA receives PSLF requests for assistance with varying degrees of complexity and staff time commitment. A significant number of cases can be time intensive and involve requesting information and assistance from student loan servicers, FSA, and the DFI. Complex cases can take several months up to a year or more to be fully addressed or resolved. As of July 2024, SLA was working on 34 complex PSLF cases. This figure does not include complex cases SLA may be working on related to other student loan issues. Frequently received anecdotal feedback suggests that borrowers would likely not have enrolled in the PSLF program or received eventual forgiveness without our direct assistance. Ensuring the SLA has adequate resources to answer both complaints and general borrower questions in a timely manner is essential to continue supporting borrowers on their path to PSLF.

While Chapter 248, Laws of 2022 allowed SLA to add one additional staff to cover the demand for addressing complaints and PSLF-specific outreach, SLA has struggled the past three years to respond to borrowers' requests for assistance in a timely manner. Between 2022–2024, SLA received an average of 54 assistance requests per month. Due to the volume of requests and the backlog created, it has consistently taken SLA two to four weeks to provide an initial response and follow-up replies to borrowers. This constitutes a barrier to accessing loan forgiveness and has led to frustration among borrowers, especially during times where looming deadlines could affect their eligibility for forgiveness. Examples include the October 31, 2022, deadline for the PSLF waiver and the June 30, 2024, deadline to consolidate for the Payment Count Adjustment.

In addition to increased requests for assistance, the demand for PSLF outreach has increased as more borrowers and employers become aware of PSLF benefits due to Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024. The current SLA staffing level is appropriate to meet the demands of Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024. However, additional FTEs dedicated to conducting outreach and responding to borrower requests for assistance, will be necessary if the report's policy recommendations to implement a non-state government PSLF certification program is implemented.

OFM Oversight Limits

State government agencies

Our efforts to implement a PSLF employment certification program for state agencies have been most successful with the agencies that OFM oversees. While each state agency has discretion over their own HR policies and procedures, OFM has been able to provide guidance and templates to help these agencies implement and oversee their own PSLF employment certification programs.

A challenge we have faced in our outreach efforts to implement the current PSLF employment certification program is that OFM does not have oversight authority over school districts and educational service districts. The same challenge would exist if the PSLF employment certification program were amended to include local, federal and Tribal government entities, and nonprofit organizations located in Washington.

The Office of the Superintendent of Public Instruction oversees school districts and educational service districts that are subject to the notification and certification requirements in Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024. However, outreach efforts are cumbersome because each district has its own separate HR policies and processes and is responsible for its own communications with its employees.

Individual-level outreach from OFM State HR to each district's administration presented challenges, as the districts are not regularly in contact with OFM. To address this challenge, thanks to Chapter 2, Laws of 2024, we are now partnering with OSPI to coordinate communications with the school districts and ensure information about PSLF is coming from an agency with which they have an established partnership. We are also collaborating with the union representing K-12 employees to help disseminate benefit information to their employees.

Non-state government employers

As we contemplate development of a statewide initiative for local, federal, and Tribal government entities and nonprofit organizations, we must consider whether a collaborative or regulatory approach will be most effective. This is a diverse group of public service employers, separately responsible for their own HR functions.

The PSLF program will continue to partner with these employers to increase awareness, improve access, and remove barriers to the PSLF program in accordance with Chapter 248, Laws of 2022 and Chapter 2, Laws of 2024, by providing employer and employee resource materials, conducting outreach, serving as a liaison, and providing information in response to employer and borrower requests.

OFM and SLA will partner with the SOS, DFI, ESD, L&I, and DOL to conduct research and explore recommendations for oversight of a statewide employer certification program for county, city, other local government entities and nonprofit organizations along with methods to identify PSLF-eligible nonprofit employers.

A collaborative, rather than regulatory approach, is recommended for federal and Tribal government entities and is more likely to be successful. OFM and SLA will continue outreach efforts with Tribal governments to influence best practices regarding the PSLF program, and these efforts can be strengthened by providing additional outreach capacity to SLA.

Employer data constraints

SLA is charged with sharing PSLF materials broadly with nonprofit and local government employers in the state.⁴¹ However, identifying PSLF-qualifying nonprofit employers and gathering local government contacts is time-consuming and riddled with difficulty. FSA does provide a PSLF Employer Search Tool for borrowers to see if their employer qualifies for PSLF.⁴² However, this tool requires already knowing an employer's EIN and only shows employers that have had prior employment certification forms submitted. There is no comprehensive database of all PSLF-qualifying employers or contact information for each employer.

The lack of access to employer information and the intricacy of the employment requirements⁴³ can make it incredibly challenging for some borrowers to determine if their employer qualifies for PSLF. While PSLF regulations explicitly identify government and 501(c)(3) employers as qualifying employers, other nonprofit employers under different tax codes are reviewed on a case-by-case basis. The burden of proof lies on the borrower pursuing PSLF to provide documentation showing that their employer provides PSLF-qualifying services.⁴⁴ This adds another layer of complexity to the PSLF system that borrowers

need to navigate. These borrowers may spend months awaiting a determination from FSA on whether their employer, and subsequently their payments, qualify for PSLF.

Borrowers working for governments and 501(c)(3) employers may also have to go through this employer approval process if their employer isn't listed correctly in the PSLF Employer Search Tool. For example, SLA has been working with a borrower who works for the Washington State Wine Commission, a state agency,⁴⁵ and was only able to help establish the Wine Commission as a PSLF-qualifying employer after a year of advocating with the FSA Ombudsman Office. Many borrowers work for agencies that should be automatically approved as PSLF-qualifying employers but must face the difficult task of gathering documentation and waiting for an unknown period for a determination.

Without clear information about which employers qualify, borrowers may struggle when making the decision to pursue or continue with public service and PSLF. With over 800,000 possible PSLF-eligible employees in the state, it is a challenge for SLA and OFM to provide adequate support to all those navigating the employer approval process. These numbers emphasize the need for more comprehensive PSLF-qualifying employer data and efficient PSLF-employer approval processes at the federal level.

As noted above, the PSLF program will work with partner agencies to determine methods for identifying PSLF eligible nonprofit employers. The federal policy recommendations below provide suggestions to improve or enhance federal PSLF systems to increase access and remove barriers to achieving student loan forgiveness for borrowers in Washington state and across the nation.

Federal Policy Recommendations

While this report emphasizes Washington state PSLF policy recommendations that can improve the efficacy of our PSLF statewide initiative, we would be remiss if we do not comment on opportunities at the federal policy level. As a state, we are limited when it comes to systemic changes that may improve access and remove barriers to PSLF for Washington borrowers. The following changes are likely to improve access and remove barriers for borrowers in other states as well.

- I. **ED should continue to partner with SLA for borrower presentations and other outreach engagements to increase trust in PSLF information.** Based on the PSLF employee survey, FSA is ranked as the most trustworthy messenger about PSLF, followed by the SLA. To build trust with borrowers, SLA will continue inviting FSA representatives to our borrower presentations and outreach engagements. This will help build rapport for the PSLF program both at the state and federal levels. While there may be limited resources for this at the federal level, we recommend FSA make these engagements a priority.
- II. **To reduce delays and confusion, ED should allow employers to make changes to all fields in “Section 4. Employer Information” of the digital signature document processed through the PSLF Help Tool.** While employers have the flexibility to edit this information on the manual PSLF Form, employers cannot currently edit all the fields on this page of the DocuSign feature on the PSLF Help Tool. This can often create confusion and delays in the completion of forms as employers must reach out to employees to request them to cancel their submission and to resubmit a new form with correct information.
- III. **To improve access for borrowers, ED should allow Parent PLUS Loan borrowers to enroll in any available Income-Driven Repayment (IDR) plan.** Currently, Parent PLUS borrowers do not have access to any IDR plan, unless they consolidate their loans. Even then, with a single consolidation, Parent PLUS borrowers can only access the Income Contingent Repayment (ICR) plan, the least generous of all IDR plans, requiring 20% of a borrower’s discretionary income. ED should make all IDR plans available for consolidated loans containing Parent PLUS loans, regardless of how many consolidations the borrower may have completed.

- IV. **To ensure effective implementation of the Unified Servicing and Data Solution (USDS) and other initiatives, we appeal to Congress to approve ED’s request for additional funding to FSA.** ED has not received its requested increase in funding from Congress to support [USDS implementation](#) and other major undertakings for Fiscal Year 2024.⁴⁶ As a result, ED has made cuts to servicing that have negatively impacted the quality of loan servicing borrowers are receiving, and ED has already made temporary modifications to contracts to accommodate the funding shortage. Adequate funding is necessary to ensure long-term USDS implementation and quality servicing to borrowers pursuing PSLF.
- V. **We recommend ED create transparency for student loan borrowers and regulators regarding who is performing different actions on their account to manage PSLF and other specialty servicing.** With the new servicing environment, PSLF management activities are being performed by both FSA and contractors who are also mostly student loan servicers. As a result, borrowers and regulators do not currently have a way to identify which contractors may be performing each task on a borrower’s account. This could include creating a labeling system on StudentAid.gov showing which contractor completed which action. For call centers, FSA may require representatives to provide information about which contractor they are associated with.
- VI. **We recommend ED allow employers and state agencies to submit information regarding employer PSLF eligibility directly to FSA.** The current process to add an employer as eligible or fix an ineligible employer on the PSLF Employer database is very cumbersome and relies on the borrower submitting information to FSA along with their PSLF Form. FSA should allow employers and/or state agencies with access to the required information to submit documentation directly to FSA to help establish eligibility for PSLF employers.
- VII. **We recommend ED share more data on a continuous basis regarding federal student loans, including data on student loan forgiveness by state.** Currently, the website that houses information on PSLF has not been updated since June 2023.⁴⁷ While FSA has provided updates regarding discharges by state through press releases, it’s important to also house all information on a single page, on a month-to-month basis, to allow state advocates to track forgiveness trends more closely. In addition, while the current available reports track national trends regarding PSLF Form submission and processing, that information should also be provided in a state-by-state breakdown.

VIII. **We recommend establishing a data sharing agreement for Washington state to share borrower and employer information with FSA.** Sharing data directly with FSA regarding employment information would make the annual recertification process seamless for both employers and borrowers. State agencies, with OFM’s guidance, could pilot the data sharing agreement and eventually expand the option for other employers to opt-in. FSA has expressed interest in pursuing an agreement but does not have enough resources to implement it. Ensuring FSA has enough resources for this project will be essential.

Appendix A: PSLF Timeline

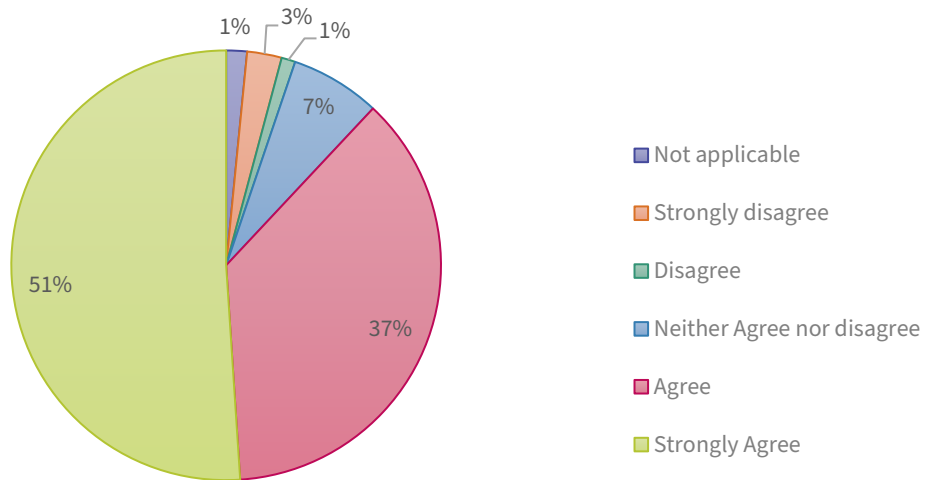
PSLF Timeline

Oct 2007	<ul style="list-style-type: none">• Congress enacts the College Cost Reduction and Access Act creating the Public Service Loan Forgiveness program (PSLF).
Oct 2017	<ul style="list-style-type: none">• First cohort of student loan recipients is eligible to apply for PSLF.
May 2018	<ul style="list-style-type: none">• Congress enacts the Temporary Expanded Public Service Loan forgiveness (TEPSLF) program, allowing borrowers who made prior payments on Direct loans on nonqualifying repayment plans to count those payments towards PSLF.
Nov 2020	<ul style="list-style-type: none">• Nationally, less than 2% of borrowers who submitted PSLF applications were approved for PSLF discharge, while over 98% had their application denied. (https://hastingslawjournal.org/wp-content/uploads/Wu_15-Final.pdf)
Oct 2021	<ul style="list-style-type: none">• Depart of Education announces the PSLF waiver, allowing borrowers to receive credit for prior repayment periods. Payment periods which would not have otherwise counted now count towards PSLF. PSLF waiver expires on Oct. 31, 2022.
Apr 2022	<ul style="list-style-type: none">• Department of Education announces the Payment Count Adjustment, carrying over a lot of the benefits of the PSLF waiver, in addition to allowing Parent PLUS borrowers to benefit. Payment Count Adjustment expires in June 30, 2024.
Jul 2022	<ul style="list-style-type: none">• PSLF Borrowers begin to transfer from servicer FedLoan to MOHELA. Transfer is completed in December 2022.
Jun 2023	<ul style="list-style-type: none">• Department of Education implements permanent changes to the PSLF program including several flexibilities, such as permanently counting certain forbearances and deferments as PSLF qualifying payments and allowing certain contractors to qualify for the program.
May 2024	<ul style="list-style-type: none">• PSLF program management transfers from MOHELA to Federal Student Aid and Business Process Operations (BPO) vendors. Borrower's PSLF information finishes transferring from the MOHELA platform to StudentAid.gov in June 2024.

Appendix B: Borrower Webinar Survey

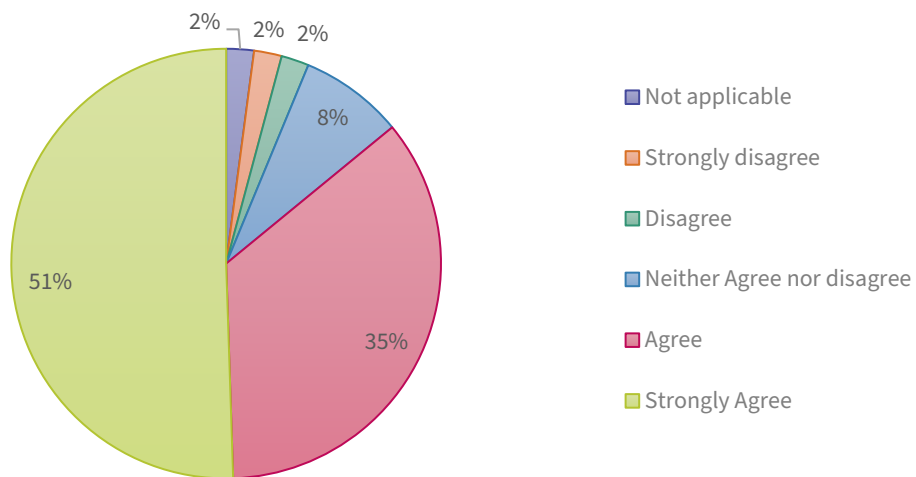
Because of this workshop, I now know the requirements for the PSLF program.

n=192



Because of this workshop, I now know how to certify employment & apply for PSLF.

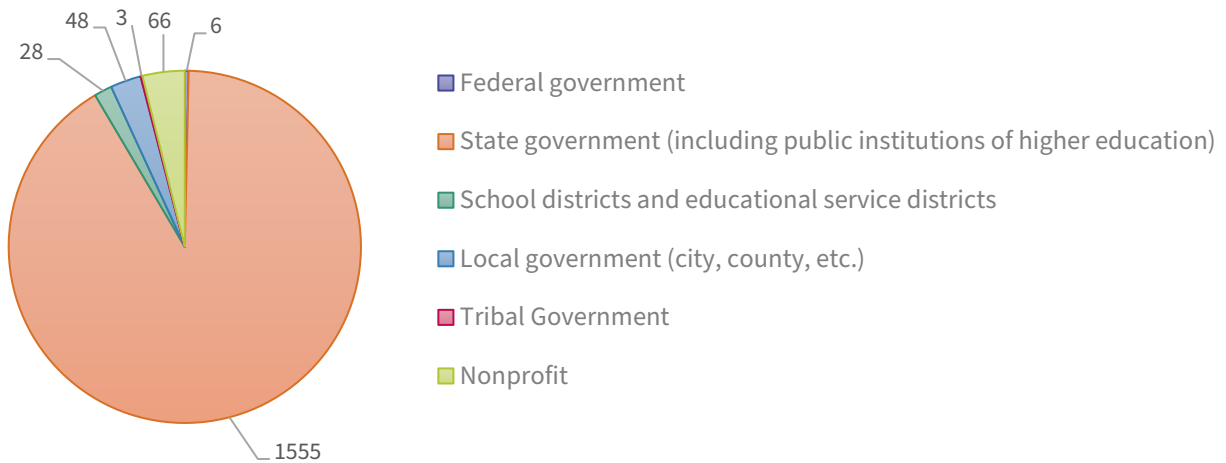
n=192



Appendix C: Borrower and Employer Surveys

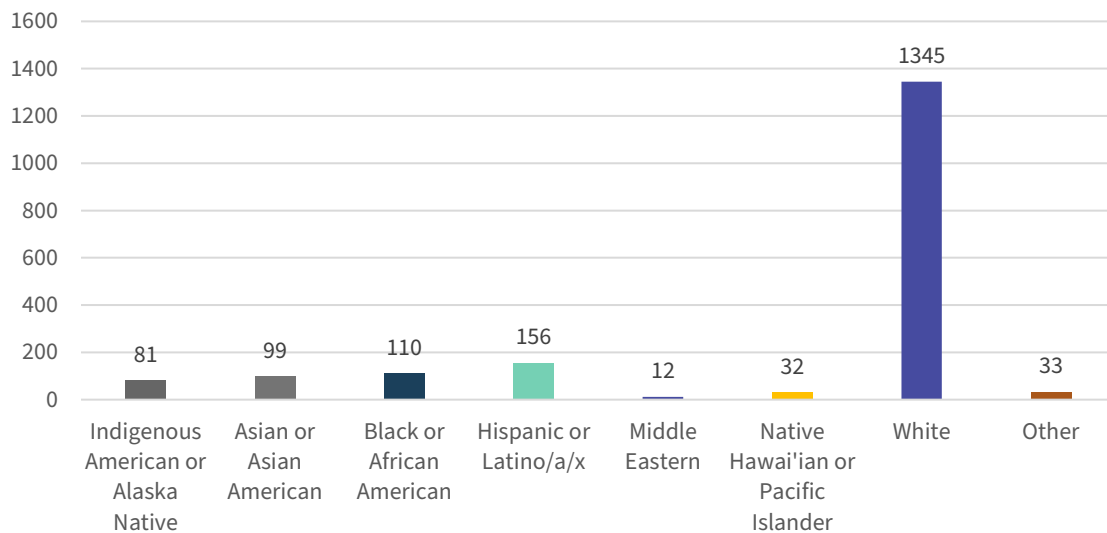
PSLF borrower survey areas of public service

What is your current area of public service?
n=1706



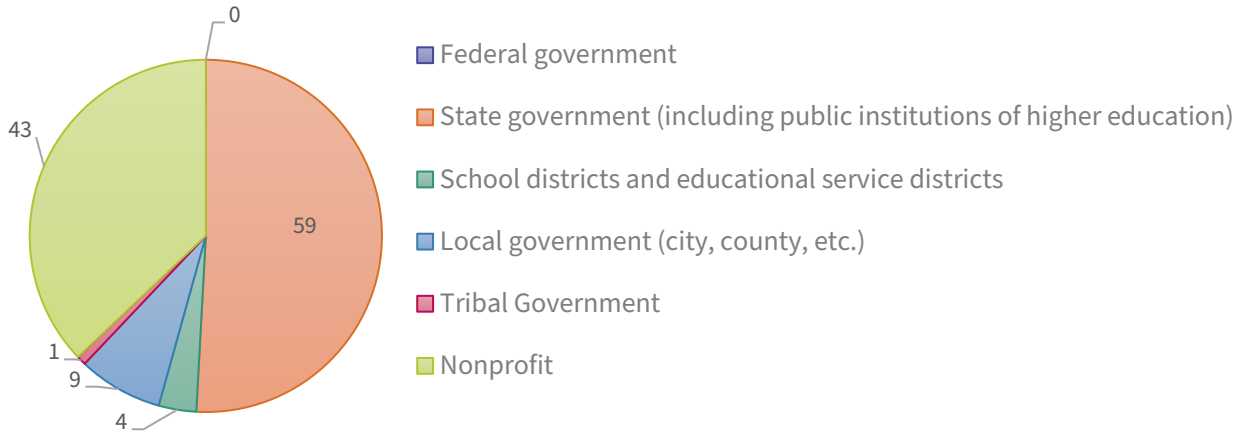
PSLF borrower survey race and ethnicity distribution

What is your race/ethnicity? Select all that apply.
n=1629



PSLF employer survey, employer type distribution

What kind of agency or organization do you work for?
n=116



Appendix D: PSLF Borrower Count and Loan Discharge Data sources

Source data for ED FSA borrower information charts

Figure 3: Washington borrowers with processed PSLF discharges (PSLF, TEPSLF, and limited waiver) in Washington state.

Figure 4: Amount of loans forgiven in millions (\$) through PSLF (PSLF, TEPSLF, and limited waiver) in Washington state.

Chart data effective date	Data source
March 2022 – June 2023	U.S. Department of Education Office of Federal Student Aid, Public Service Loan Forgiveness Data: https://www.studentaid.gov/data-center/student/loan-forgiveness/pslf-data
December 2023	Email to Kaity.Cazares@ofm.wa.gov From: Patrick.Campbell@ed.gov Thursday, February 22, 2024 12:58 AM Subject: RE: MOHELA Issue and Washington PSLF Data Request
March 2024	U.S. Department of Education, press release April 3, 2024: Biden-Harris Administration Approves Additional \$5.8 Billion in Student Debt Relief for 78,000 Public Service Workers U.S. Department of Education
June 2024	Email from: FSAengagement@ed.gov To: rachel.gittleman@ed.gov Bcc: terri.parker@ofm.wa.gov Tuesday, September 9, 2024 2:51 PM Subject: New State by State Forgiveness Data https://www.ed.gov/sites/ed/files/documents/press-releases/202405-updated-state-by-state-discharge-figures.pdf

Acronym Glossary

Acronym	Description
AGO	Office of the Attorney General
BPO	Business Process Operations
CFPB	Consumer Financial Protection Bureau
DES	Department of Enterprise Services
DFI	Department of Financial Institutions
DOL	Department of Licensing
DRS	Department of Retirement Systems
ED	U.S. Department of Education
ESD	Employment Security Department
Chapter 248, Laws of 2022	Engrossed Substitute Senate Bill 5847, 2022 regular legislative session, Chapter 248, Laws of 2022 AN ACT Relating to providing information to public service employees about the public service loan forgiveness program; adding a new section to chapter 28B.77 RCW; adding a new section to chapter 43.41 RCW; adding new sections to chapter 41.04 RCW; creating new sections; and declaring an emergency. https://lawfilesexternal.wa.gov/biennium/2021-22/Pdf/Bills/Session%20Laws/Senate/5847-S.SL.pdf?cite=2022%20c%20248%20s%205
FSA	U.S. Department of Education Office of Federal Student Aid
Chapter 2, Laws of 2024	House Bill 1950, 2024 regular legislative session, Chapter 2, Laws of 2024 AN ACT Relating to the public service loan forgiveness program; and amending RCW 41.04.045, 41.04.055, and 43.41.425. https://lawfilesexternal.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1950.SL.pdf?cite=2024%20c%202%20s%202
IDR	Income Driven Repayment plan
L&I	Department of Labor and Industries
OFM	Office of Financial Management
OSPI	Office of the Superintendent of Public Instruction
SAVE	Saving on a Valuable Education
SLA	Washington Student Achievement Council Office of the Student Loan Advocate
SOS	Office of the Secretary of State
SBPC	Student Borrower Protection Center
USDS	Unified Servicing and Data Solution https://studentaid.gov/sites/default/files/usds-fact-sheet.pdf
WSAC	Washington Student Achievement Council

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