

Public Comment on Public Service Loan Forgiveness Program

US Department of Education

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Thank you for the opportunity to provide feedback on the PSLF program. We are the Center for the Study of Child Care Employment and write today in regards to the early care and education workforce (educators of children birth to age 5) and the impact of PSLF on their ability to pursue higher education to expand their knowledge and skills, serve children and families, and remain in the field as the essential workforce they are.

The PSLF program provides the opportunity to ease the financial burden on early educators associated with meeting increasing requirements such as degree attainment and teaching certification. The early education field is made up almost entirely of women, and half are women of color performing one of the least paid jobs in the country. On average these women earn \$11.65 an hour.¹ Many of these educators possess post-secondary degrees, for which they incurred student loan debt. We need to support this field without over burdening them or keeping them in debt. While many states have similar debt forgiveness programs specific to educators, they are nearly all exclusively for teachers in K-12. The federal PSLF program provides one of the only opportunities for early educators to access critical loan forgiveness that would otherwise be unavailable to them.

Teaching staff at early education programs are largely eligible for PSLF, but face substantial barriers to accessing its benefits. Clarifying and expanding the eligibility parameters, educating educators on these parameters and the process of the program, and reducing the number of payments necessary for full forgiveness may be important strategies to improve the recruitment and retention of this skilled, essential workforce. There are three issues we would like to bring to your attention.

First, in recognition of the low wages afforded to early educators, the National Academies of Sciences recommended that early educators not be required to incur additional debt to pursue higher education degrees given the low wages paid to this workforce. Until this recommendation is realized, we urge the Department of Education to expand the eligibility of “qualified employers” to include all entities providing early care and education services -- this expanded definition would include home-based providers who may be self-employed or operating an LLC, as well as non-profit programs, and those programs receiving federal or state funding in the form of subsidy or voucher.

¹ (McLean, et al. Early Childhood Workforce Index-2020. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley. Retrieved from <https://cscce.berkeley.edu/workforce-index-2020/report-pdf/>)

Second, the 120 qualifying payments required represent a significant burden for the early education field, namely because of their low wages and high mobility both within and out of the field. It is common for early educators to move from one program or center to another to seek out better wages, or to leave the field (and public service entirely) for roles that pay a living wage. Retaining a highly qualified teaching force is an essential public good. Significantly reducing or waiving the number of repayments for low wage workers like early education (family child care providers, center teaching staff) could encourage individuals to remain in the early education field.

Finally, the COVID-19 pandemic greatly impacted the early education field with significant program closures -- both temporary and permanent. During the 2020-2021 school year many educators experienced being furloughed, laid-off, and/or had their hours reduced; some educators have not yet returned to work because of program closures. Educators may still find themselves working less than full-time and/or unable to make payments on time or in full, all of which impacts their eligibility to make "qualifying payments" within the current PSLF program guidelines. We recommend:

- (1) counting all payments made during the forbearance period, as well as payments during potential future forbearance periods, as educators (and others) should not be penalized for continuing to make payments toward their debts if they are financially able to do so;
- (2) counting all payments made regardless of the amount of hours one works to ensure that educators (and others) are not penalized for any reduction in hours.

Given the severe under-resourcing of the early care and education system pre-pandemic, which has now been exacerbated, any relief that is possible to afford to current and future early educators by implementing the above recommendations may have a significant impact on the ability of the field to recruit, educate, and retain this essential workforce.

Respectfully,

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