

July 16, 2024

TO: Office of Postsecondary Education, Department of Education, Assistant Secretary, Dr. Nasser Paydar

RE: Request for Information on For-profit Early Childhood Education Providers

Document Citation: 89 FR 51878

Document Number: 2024-13446

Docket Number: ED-2024-OPE-0072

Dear Dr. Nasser Paydar,

Thank you for the opportunity to provide feedback on the Request for Information (RFI) regarding the operational aspects of including for-profit early childhood education programs and providers as eligible employers for the Public Service Loan Forgiveness (PSLF) program. We at the [Center for the Study of Child Care Employment](#), at the University of California, Berkeley, write in response to this RFI to emphasize the need for equitable access to PSLF for all early educators, regardless of their employer's tax status.

The early care and education (ECE) sector operates within a mixed delivery system encompassing non-profit, for-profit, and home-based settings. Early educators, whether working in center-based programs or home-based environments, provide critical services that support children's development and contribute significantly to our society. However, educators, particularly those working in for-profit and home-based settings, are often excluded from PSLF eligibility.

As suggested in our previous feedback dated [August 11th, 2022](#), given that nearly *all* early educators face [economic challenges and low wages](#), expanding the definition of qualified employers to include for-profit entities is essential to ensure that all early educators, especially home-based providers, have access to PSLF. This would help alleviate education-related debt and support the sustainability of the ECE workforce. In addressing questions 1, 2, 3, and 5 in the RFI, we urge the Department of Education to collaborate with

state agencies to create a pathway for demonstrating PSLF eligibility that minimizes undue bureaucratic complexities and administrative burdens on applicants. The Department might consider methods such as self-attestation, submitting evidence of the early childhood employer's state license or registration, and utilizing individual tax returns for self-employed home-based educators.

The burden of identifying employer eligibility should not rest on the educators but rather on the systems designed to support them. As suggested above, **we strongly believe that state systems, in conjunction with federal oversight, should develop efficient mechanisms that play a crucial role in verifying and determining employer eligibility.** The reality is that, given the way that child care systems are organized and defined differently from state-to-state, there is no one-size approach that will work - what's considered a licensed small family child care business in California, for example, is not required to be licensed/registered in Iowa. If there are no uniform sources, the Department should work with state agencies to innovate. More importantly, ensuring equitable access to PSLF for all early educators regardless of their employer's tax status will align with the Department's commitment to equity and the broader goal of supporting the early childhood workforce. By expanding eligibility – simplifying and streamlining verification processes – the Department can begin to make significant strides in addressing the historical and ongoing [financial challenges](#) faced by early educators and fostering a more equitable and sustainable ECE system.

Thank you for considering our recommendations. We look forward to the positive changes that these considerations can bring to the PSLF program.

Sincerely,

Dr. Lea J. E. Austin

Executive Director, Center for the Study of Child Care Employment at UC Berkeley

Prepared by: Tobi Adejumo

For further information contact: tobi.adejumo@berkeley.edu