

September 12, 2011

Mr. James Hyler, Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue, S.W.
Lyndon Baines Johnson Building
Washington, DC 20202-4537

Sent via email: ICDocketMgr@ed.gov

Dear Mr. Hyler:

On behalf of the 145,000 members of the National Association of Social Workers (NASW), thank you for the opportunity to comment on the Proposed Employment Certification Form for Public Service Loan Forgiveness. Founded in 1955, NASW is the largest membership organization of social workers and seeks to enhance the well-being of individuals, families and communities through its work and advocacy.

NASW applauds the Department for its work on this program to reduce student loan debt for social workers and other public service workers, such as teachers and nurses, who provide crucial social safety net services to children and families every day. Social workers help people function better in their environments, improve their relationships with others, and solve personal and family problems through individual, social, and psychological support. The most commonly reported practice areas of licensed social worker members are mental health (37%), child welfare/family (13%) and health (13%). Social workers also work with older adults, adolescents, and with other populations in various settings.

The country's social services delivery system depends on social workers who are willing and able to commit long-term to public service. However, too many social work graduates are unable to pursue public service careers due to the overwhelming burden of their student loan debts. The average education loan debt of social work students graduating with a master's degree in social work is \$26,777. Those with bachelor's degrees in social work faced repayment of \$18,609 in education loans and those with doctoral degrees in social work were \$32,841 in education debt.

In addition, repayment is particularly challenging for social workers, whose salaries continue to be among the lowest for professionals in general and for those with master's level educations in particular. Survey results showed the median salary for social workers with two to four years experience was \$35,600.

With respect to the Proposed Employment Certification Form, we recommend that any application that is denied, the Department provide the borrower with a full explanation for the reasons for denial and an opportunity to correct any errors or admissions in their application. Further, any form should be user friendly and efficient.

We look forward to a swift and full implementation of this loan forgiveness program.

Sincerely,



Elizabeth J. Clark, PhD, ACSW, MPH
Executive Director