



August 11, 2022

U.S. Department of Education
Office of the Secretary
400 Maryland Avenue SW
Washington, D.C. 20202

VIA ELECTRONIC SUBMISSION

Re: Student Assistance General Provisions, Federal Perkins Loan Program, Federal Family Education Loan Program, and William D. Ford Federal Direct Loan Program [Docket ID ED-2021-OPE-0077]

Dear Secretary Cardona:

The National Association of Social Workers (NASW), the largest membership organization of professional social workers, submits these comments in response to the Department of Education's (ED) proposal to improve student loan assistance programs. NASW has 110,000 members and works to enhance the professional growth and development of social workers, to create and maintain professional standards, and to advance sound social policies. Our comments are focused on proposed changes to the federal Public Service Loan Forgiveness (PSLF) Program

Through the PSLF waiver, many social workers and other public service professionals are finally accessing student loan debt forgiveness after completing years of qualifying employment. We are encouraged and supportive of ED's proposed changes to the PSLF program, including codifying the waiver into PSLF regulations. That said, we want to emphasize the need to predicate eligibility for PSLF on public service and not the tax status of employers. Many social workers, who are serving on the frontlines across numerous settings, do not qualify for PSLF because they are employed by for-profit employers or non-profits, such as 501(c)6 organizations, that currently do not qualify for PSLF.

BACKGROUND

The Impact of Student Debt on the Social Work Workforce

The nation's 700,000+ social workers are an essential workforce that routinely work in high-need communities, provide support to vulnerable children and adults, and conduct policy-related work aimed at improving the conditions of society as a whole. Social workers provide critically needed services to millions of Americans every day in a broad range of settings including healthcare facilities, schools, child welfare, community agencies, correctional institutions, and private



practice. As the largest provider of mental health services in the US, the value of this work has remained especially impactful during the COVID-19 pandemic. As an essential workforce, social workers continue to serve on the frontlines helping communities directly affected by the pandemic and in other emerging public health emergencies, delivering behavioral health services to individuals in crisis, and in many cases risking their lives to ensure that care remains accessible for those in need of assistance.

Social workers tend to have high student loan debt, but relatively low pay, making participation in the profession financially difficult and student loan debt relief essential.

Despite the incredibly valuable service that social workers provide, access to student loan debt relief often remains out of reach for this workforce. Even after obtaining a Masters of Social Work (MSW), which is the terminal degree to practice social work independently, countless professionals remain locked in the entrapment of perpetual student loan debt. This economic stress is especially felt within this increasingly racially and economically diverse profession that is majority female and has a large proportion of first-generation college graduates.

Survey data from *NASW and the Council on Social Work Education* reflects that MSW students have on average between \$68,000- \$76,000 total student loan debt¹. Recent new graduate data indicates that social workers of color are carrying much higher student loan debt than their white peers, with Black social work graduates' total student loan debt at approximately \$92,000 and Hispanic graduates at \$79,000. The student loan debt burden carried by social workers is further compounded by the workforce's comparatively low salaries and compensation relative to average student loan debt loads. The aforementioned survey of new social work graduates also indicates that starting salaries for MSW graduates remains very low at approximately \$47,000 annually.

Despite the currently projected 12% growth rate of this workforce, the broad scope of work performed by social workers, and significant volume of direct clinical services provided to Medicare and Medicaid beneficiaries, annual salaries and insurance-based reimbursement remain low. Social workers serve in a variety of settings, providing crucial services to society and yet are dually economically harmed by inadequate compensation and growing student loan debt.

¹ Council on Social Work Education and National Association of Social Workers. (2020). The social work profession: Findings from three years of surveys of new social workers. <https://www.cswe.org/CSWE/media/Workforce-Study/The-Social-Work-Profession-Findings-from-Three-Years-of-Surveys-of-New-Social-Workers-Dec-2020.pdf>

NASW comments:

- a. **NASW supports ED’s proposal to amend its definition of “full-time” to create a single standard for all public service workers.** ED’s proposed definitions of full-time employment will help to level the playing field for all public service workers and will extend student loan debt cancellation to more non-tenured educators preparing our future social work workforce.

- b. **NASW supports ED’s proposal to remove the limitations on when and how qualifying payments are made.** ED’s proposed rule would remove an unnecessary limitation on how borrowers make qualifying payments.

- c. **ED’s proposed rules to grant PSLF credit for certain time spent in deferment or forbearance should be expanded.** NASW supports including all time in deferment and forbearance, especially because student loan servicers have often counseled social work borrowers into periods of forbearance and deferment and away from IDR, which is counterproductive for PSLF loan forgiveness.

- d. **NASW supports ED’s proposed rule to allow for qualified payments made on a Direct Loan to be applied to a subsequent Direct Consolidation Loan and urges ED to extend this same opportunity to FFEL borrowers.** ED’s proposal to award PSLF credit on Direct Consolidation Loans for time spent on underlying Direct Loans is an important step toward making PSLF work for borrowers.

- e. **NASW supports ED’s proposal to help automate the program by allowing for the Secretary to make PSLF determinations on borrowers’ PSLF eligibility without an application.** ED’s proposal to remove the burden of applying for PSLF from individual borrowers and to instead automate debt cancellation for public service workers will help ensure relief reaches borrowers who desperately need it.



While NASW is encouraged by and supportive of many of these proposals, additional changes to the PSLF program are still needed. NASW urges ED to consider granting PSLF eligibility to all social workers who are routinely providing public service, basing their eligibility on their function or connection to public service rather than the tax status of employers. ED's current proposal excludes entire subsets of the social work workforce from PSLF, including social workers employed by for profit companies or contractors and non-qualifying non-profits, such as 501(c)6 and 501(c)4 organizations. For example, NASW is not a qualifying employer for PSLF, despite employing many social workers and providing crucial services to the profession.

Thank you for your consideration of these comments. If you have any questions, please do not hesitate to contact me at sbutts.nasw@socialworkers.org.

Respectfully submitted,



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