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May 17, 2024

Dr. Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Re: RIN 1840-AD93, Notice of Proposed Rulemaking concerning Student Debt Relief

Dear Secretary Cardona:

The National Association of Social Workers (“NASW”) appreciates the opportunity to provide this comment in response to the Department’s April 17, 2024 Notice of Proposed Rulemaking (NPRM) regarding Student Debt Relief for the William D. Ford Federal Direct Loan Program (Direct Loans), the Federal Family Education Loan (FFEL) Program, the Federal Perkins Loan (Perkins) Program, and the Health Education Assistance Loan (HEAL) Program.¹ Founded in 1955, NASW is the largest membership organization of professional social workers in the nation. NASW has 110,000 members and works to enhance the professional growth and development of its members, to create and maintain professional standards, and to advance sound social policies. We write to provide support for various aspects of the NPRM and provide information about the acute burdens of student debt for the social work workforce.

In brief, social workers provide essential services to people with varied behavioral health and social care needs in all stages of life. These needs were exacerbated by the coronavirus pandemic and rising demand for mental health services. The need for social workers is projected to grow significantly over the next decade, but educational institutions

¹ 89 Fed. Reg. 27,564 (Apr. 17, 2024).

are not on pace for meeting this need. The cost of education for social workers is high—a Master’s degree and licensure is required to practice clinical social work independently—but compensation remains persistently low. Accordingly, many of our members have an unsustainable student loan debt burden. Further, this debt burden is not distributed equitably. Our highly indebted profession is disproportionately comprised of women—over 83% of social workers are female.² And within the profession, people of color and women hold a disproportionate share of student loan debt. Our profession is racially and socioeconomically diverse, and a high proportion of new graduates in our field are the first in their family to graduate from college.

Meaningful student debt relief is essential to ensure a strong and plentiful social work workforce and to keep the profession financially accessible. As the Department knows, the Public Service Loan Forgiveness (PSLF) program has not been a reliable source of relief for all social workers, because many social workers and other public service professionals do not qualify for PSLF due to the tax status of their employers. As a result, many applicants have persistent debt that they cannot afford to repay. This debt causes financial stress for many social workers and poses a barrier to non-profit and government employment. In some cases, it drives highly qualified social workers out of the profession.

We applaud and support the Department’s proposals, which will provide much-needed support to social workers who face a variety of challenges from excessive student debt burdens. And we also applaud the Department’s proposals to make many of these programs automatic rather than application-based, as the complexity of student loan programs and the burden of paperwork associated with applying for relief often serve as substantial barriers to access for our members. Each of the proposed changes has NASW’s support and would make a substantial difference to workers in our profession.

We have gathered many social workers’ student debt experiences below, either from previous submissions to the Department or from the docket for this proposal, to provide individual stories that illustrate the profession-wide trends.³ We hope that their compelling voices support the Department’s decision to act.

² The George Washington University, *Profile of the Social Work Workforce 5* (2017), <https://www.cswe.org/Centers-Initiatives/Initiatives/National-Workforce-Initiative/SW-Workforce-Book-FINAL-11-08-2017.aspx>.

³ In addition to comments cited from the docket from this proposal, we previously collected and reviewed copies of individual comments submitted by our members and other social workers in response to a campaign we undertook to raise awareness about a prior Request for Information about the PSLF program. We have quoted or summarized

Social workers provide an essential public service.

There are over 700,000 professional social workers nationwide and they are the largest provider of mental, behavioral and social care services in the U.S. Social workers are licensed and credentialed at the Bachelor's, Master's, and PhD levels. Roughly 250,000 are licensed clinical social workers, who are required to have a Master's degree and licensure to practice independently.

Social workers help people cope with and solve a wide variety of problems in their everyday lives. They are found in every facet of community life, including schools, hospitals, behavioral health clinics, senior centers, prisons, child welfare and juvenile services, the military, corporations, courts, private practice, elected office and in numerous public and private agencies. Social workers provide urgently needed mental health and behavioral health services and help clients who face a disability or a life-threatening disease or a social problem, such as inadequate housing or unemployment. Social workers serve on crisis response teams and assist victims of violence. They also assist families that have serious domestic conflicts, involving child or spousal abuse and neglect. Social workers conduct research, advocate for improved services, engage in systems design, manage non-profits, or are involved in planning or policy development. Social workers provide these critically needed services to millions of Americans every day.

Many social workers specialize in serving a particular population or working in a specific setting. Some examples include:

- **Aging:** Social workers link older adults with services that help them live independently and with dignity, thereby maximizing their quality of life and participation in society. Social work with older adults focuses on the physical, psychological, social, and economic aspects of daily living.
- **Child Welfare:** Child welfare social workers serve some of the most vulnerable children, youth, and families. Social workers specialize in building on the strengths of families and helping them to provide a safe and nurturing environment for children and youth. However, when families are unable to do this, social workers must intervene to reduce risk and protect children from

comments that we believe are typical or exemplary of social workers' experiences with student debt throughout this submission. If you have any questions about these comments, require additional details, or would like to review a spreadsheet summarizing them, please contact our counsel, identified below.

harm. Child welfare social workers ensure that children and youth who have experienced abuse or neglect are supported through a range of services.

- **Health Care:** Health care social workers help people deal with personal and social factors that affect health and wellness. Some health care social workers are in direct services and concentrate on individuals, families, and small groups. Others work in settings where the focus is on planning, administration, and policy. In the health care setting, social workers may conduct research, develop programs, and administer departments.
- **Schools:** Social workers in schools provide mental health and behavioral health services to students and an array of other services that support student health, wellbeing and academic achievement. These social workers often run groups, work on attendance issues, address student hunger and homelessness. They may also assist with students who have disabilities and or require Individual Education Plans.
- **Mental Health and Substance Use Disorder Services:** Clinical social workers focus on assessment, diagnosis, treatment and prevention of mental health and behavioral health conditions, including substance use disorders. Clinical social workers are essential to a number of client-centered settings and can be found in private practice, agencies and other community-based settings.

The COVID-19 pandemic disrupted the health and economic and social stability of many individuals and families, exacerbating the need for social work services. Social workers provided their essential services throughout the pandemic. Hospital-based social workers faced the pandemic head on, helping staff, patients, and their families navigate a new and dangerous disease and responding to intense pressure on medical resources. Social workers ran hotlines for students struggling with mental health during remote schooling.⁴ They have responded to sharp increases in anxiety and depression nationwide, and corresponding increases in substance abuse and overdoses.⁵ Those working in nursing homes responded to catastrophic COVID-19 infection rates and corresponding facility quarantines, supporting residents, and providing information and support to

⁴ Alisa Roth, *Schools Seek Ways to Provide Mental Health Services During Pandemic*, Marketplace (Aug. 28, 2020), <https://www.marketplace.org/2020/08/28/schools-mental-health-services-covid-19-remote-learning-counseling-hotlines-appointments/>.

⁵ Jennifer Miller, *Anxiety, Depression Among North Carolinians Has ‘Tripled’ During Pandemic, Health Leaders Say*, WBTV (July 30, 2020), <https://www.wbtv.com/2020/07/30/anxiety-depression-among-north-carolinians-has-tripled-during-pandemic-health-leaders-say/>.

families.⁶ Social workers advocated for people facing great risk of COVID-19 infection in jails and prisons and have continued to serve these exceedingly vulnerable populations.⁷ This work often came with significant risk due to a lack of personal protective equipment and at great personal cost. As one social worker explained:

I am a social worker and for the past 11 years I have worked in mental health in upstate New York. I have worked with children, adults and families in outpatient clinics, inpatient facilities and emergency departments. I have shouldered the burden of keeping us safe on the front lines of the COVID-19 pandemic. During the pandemic I left my house every day, did not see my 3 year old daughter for weeks at a time, to report to the hospital system that I have dedicated the last 6 years of my career to; to support the mental health of the medical staff on the front lines; assist families in connecting with their loved ones whom they could not see in the hospital; and continued my regular role of assisting those dealing with mental health challenges in the community, which were exacerbated by the pandemic.

Even though the public health emergency has subsided, many of the stresses of the pandemic have continued, with some conditions such as OCD, anxiety, depression, and general distress continuing to be elevated into 2023 and beyond.⁸ These stresses help highlight both the acute ongoing need for social workers as well as the ongoing heightened challenges social workers must address among their patients.

The need for social work is great, but there are not enough qualified social workers to meet this need.

The demand for social workers is expected to increase in coming years. Specifically, the Bureau of Labor Statistics (“BLS”) projects that the employment of social workers will

⁶ Mercedes Bern-Klug & Elise Beaulieu, *COVID-19 Highlights the Need for Trained Social Workers in Nursing Homes*, J. Am. Med. Directors Ass’n (Vol. 21, July 2020), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7247447/>.

⁷ Alison O. Jordan & Melvin H. Wilson, *Addressing COVID-19 and Correctional Facilities: A Social Work Imperative*, NASW (June 2020), <https://www.socialworkers.org/LinkClick.aspx?fileticket=o6zZ1n0yE0k%3D&portalid=0>.

⁸ See Mary Blendermann et al., *A narrative systematic review of changes in mental health symptoms from before to during the COVID-19 pandemic*, 54 *Psychological Medicine* 43 (2024).

increase by seven percent over the next decade.⁹ This expected increase is more than twice the average expected for all occupations.¹⁰ All categories of social workers are expected to grow faster than average, with particularly rapid growth in the need for healthcare social workers and mental health and substance abuse social workers.¹¹

We are already facing a lack of qualified social workers—of note, almost all child welfare programs struggle with recruiting and retaining qualified and effective child welfare staff. Turnover rates remain high, at 20 to 50 percent nationally.¹² Nor are educational institutions on pace to meet the expected increase in need. While enrollment in social work education shows modest growth, this upward trend does not match the anticipated need for qualified social workers. A survey of educational institutions providing social work degrees documented only a 1.3% growth in enrollment in Master’s degree programs from fall 2019 to fall 2020.¹³ Federal investments in social work and social work education are critically needed to ensure that there is a sufficient supply of social workers to meet evolving demands.

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

Social workers’ salaries are low, especially compared to the level of education required to practice in the field. While social workers can work in certain settings with a Bachelor’s degree, a Master’s of Social Work (“MSW”) is the terminal degree required to practice clinical social work independently. Despite these educational requirements, the

⁹ Bureau of Lab. Stat., U.S. Dep’t of Lab., *Occupational Outlook Handbook - Social Workers*, <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm> (last visited May 14, 2024) (“BLS”).

¹⁰ *Id.*

¹¹ *Id.*

¹² *Critical Workforce Needs*, Nat’l Child Welfare Workforce Inst. (Dec. 2020), <https://ncwwi.org/index.php/resourcemenue/resource-library/change-implementation/workforce-development-planning/1597-critical-workforce-needs-2020/file>.

¹³ Ryan Bradshaw, *Spring 2021 CSWE Member Pulse Survey Results*, Council on Social Work Educ. (2021), https://www.cswe.org/getattachment/Research-Statistics/CSWE_Spring-2021-Pulse-Survey_Brief.pdf.aspx.

median salary for social workers generally is just \$58,380.¹⁴ The mean starting salary for social workers with MSWs is \$47,000.¹⁵

The disparity between salary and required education is worse than for comparable professions. For example, elementary and middle school teachers (for whom a Bachelor's degree is typically sufficient) have a median salary of approximately \$65,000.¹⁶ And other professions for which a Master's degree is required, such as economists, education administrators, genetic counselors, and nurse practitioners, are better paid than social workers. Most professions for which BLS identifies a Master's degree as necessary entry-level education have a median pay of \$60,000 or higher, and many have a median pay of \$80,000 or higher.¹⁷

As a result of the substantial education requirements and low starting salaries associated with our profession, social workers often carry significant student debt. 2019 MSW graduates have a mean total student debt of \$67,000.¹⁸ The debt load for social workers with either a Bachelor's degree or an MSW has been increasing over time.¹⁹ As

¹⁴ BLS *supra*, n. 9.

¹⁵ Fitzhugh Mullan Inst. for Health Workforce Equity, *The Social Work Profession: Findings from Three Years of Surveys of New Social Workers*, at 12 (2020), <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>.

¹⁶ Bureau of Lab. Stat., U.S. Dep't of Lab., *Occupational Outlook Handbook – Middle School Teachers*, <https://www.bls.gov/ooh/education-training-and-library/middle-school-teachers.htm>; Bureau of Lab. Stat., U.S. Dep't of Lab., *Occupational Outlook Handbook – Kindergarten and Elementary School Teachers*, <https://www.bls.gov/ooh/education-training-and-library/kindergarten-and-elementary-school-teachers.htm>.

¹⁷ Bureau of Lab. Stat., U.S. Dep't of Lab., *Occupational Outlook Handbook – Occupation Finder*, <https://www.bls.gov/ooh/occupation-finder.htm> (Filtered by “Master’s Degree” under the Entry-level Education column).

¹⁸ Edward Salsberg *et al.*, *The Social Work Profession: Findings from Three Years of Surveys of New Social Workers*, NASW (Aug. 2020) at 12, https://www.socialworkers.org/LinkClick.aspx?fileticket=1_j2EXVNspY%3d&portalid=0.

¹⁹ *2019 Statistics on Social Work Education in the United States*, Council on Social Work Ed. (2020) at iv, <https://www.cswe.org/getattachment/Research-Statistics/2019-Annual-Statistics-on-Social-Work-Education.pdf.aspx>.

discussed in more detail below, the debt burden is substantially higher for social workers of color.

As many social workers members have explained in individual comments to the Department, the debt burden compared to their salaries is crushing, and can often put them in the position of facing substantial balance growth (and thus in a position to benefit significantly from the proposed provisions under § 30.81-30.82.):

- One social worker who obtained their Master’s degree found themselves “in a cycle of [] never ending payment” with debts being accrued despite never missing a payment.²⁰ “I pay and pay and pay and the amount owed goes up and up and up. Over \$100,000.00. How is this fair? . . . I am not even able [to] buy a home because my debt [] ratio is too high all because of a loan I believed would better my livelihood.”
- Another described taking out a loan for an Associate’s Degree to become a Social Worker, followed by a Bachelor’s Degree, before having to withdraw from school to take care of a dying family member.²¹ When they were ready to return to school, their previous credits had expired and could no longer be used towards the completion of their degree requirements. They consolidated their two loans, having never missed a payment, but the consolidated \$60,000 in loans now has a balance of \$69,309. “I am a full time Nanny with one family for the past 14 years making \$19.00 and unable to work any overtime or take on a second job. . . . I am now 58 years old and making minimum payments which will never be enough to make a dent in reducing my student loan debt. I will die with this debt and any relief that may come my way would be appreciated so I could save more for retirement.”
- Another described getting a Master’s degree in social work in 2011, “after years of attending school, at times part-time while I saved money, and at other times full-time when I was able. . . . I got a job as a social worker in a grant-funded position, working toward PLSF. After nearly 5 years in that position, the grant ended, and I had to look for a different job, which is no longer eligible for PLSF. After [] various periods of being placed in deferments or forbearances by my

²⁰ See Crystal Ellison, Comment Letter on Student Debt Proposed Rule (Apr. 22, 2024), <https://www.regulations.gov/comment/ED-2023-OPE-0123-27003>.

²¹ Christine O’Neill, Comment Letter on Student Debt Proposed Rule (Apr. 22, 2024), <https://www.regulations.gov/comment/ED-2023-OPE-0123-26857>.

servicer, MOHELA, I now owe approximately \$40,000 more than my balance after graduating.”²²

- Another social worker described decades of struggle to manage their loans.²³ This commenter said, “[f]or 24 years I have dealt with Student Loans and nothing gives me more anxiety. . . . There is no way I would be able to pay off my loan. I am struggling each month to pay \$500 a month and it only goes to Interest. There is NO way the balance would be paid off and I accepted that I would have it [until] death. I am married with one child. We didn’t have more b/c of the student loan debt.”

These individual experiences are typical. Throughout the field, while social workers report satisfaction with their profession and their jobs, they are substantially less satisfied with their compensation.²⁴ Of those who reported difficulty in finding a job upon entering the job market, the most common reason was inadequate salary and compensation.²⁵ The financial pressure resulting from low salaries is heightened by high levels of educational debt.

For many social workers, this financial pressure makes it difficult to afford essential goods and services in their lives. As our members have previously told the Department, some find it difficult to balance student loan debt and childcare, while others must choose between paying their rent or mortgage and their student loans. One social worker with an MSW has previously explained, “I worked two jobs consistently while in school for nine years. I am in more student loan debt than I believe I will ever be able to get out of in my life. My child consistently asks me for a home, and I am unable to promise her that.” Another social worker explained student debt’s impact on their family:

I am an active and passionate clinician. But, having done all I have done and will continue to do - I still will not be able to pay for my own children’s higher educations, because I still owe for my own. ... [W]hile my education may be

²² Kenneth Ham, Comment Letter on Student Debt Proposed Rule (Apr. 22, 2024), <https://www.regulations.gov/comment/ED-2023-OPE-0123-26936>.

²³ Torrie Spiller, Comment Letter on Student Debt Proposed Rule (Apr. 22, 2024), <https://www.regulations.gov/comment/ED-2023-OPE-0123-27209>.

²⁴ Salsberg, *supra* note 18, at 17.

²⁵ *Id.*

priceless to me, that it most certainly has a price tag, and that tag is crippling to my family[.]

For some social workers, staying in the public service sector means living with the same intense financial pressures as the low-income people their work often supports. For example, one social worker described the difficult choices imposed by pay that totaled just \$20 more than the SNAP eligibility threshold—they could either “decreas[e] hours to feed my kids or maximiz[e] hours so I can afford to pay minimum for school.” Another social worker described “the indignity of my nonprofit employer telling us that we, Master’s degree-carrying therapists...who were serving the poorest families, could potentially qualify for food stamps based on our low salaries.”

Many of our members worry about having to continue paying their loans indefinitely, and as several have commented to the Department, they do not expect to finish paying off their loans before they die. This debt burden can also be multigenerational, as many of our members have not paid off their own student loan debt prior to taking on Parent Plus loans for their children’s education.

The high debt burden borne by social workers is inequitable.

Social workers are disproportionately women and people of color, making the high debt burden faced compared to other professions inequitable. In recent years, nearly 85% of MSW graduates have been women. Roughly 18% of graduates are Black/African American, and 15% are Hispanic/Latino.²⁶ These percentages are much higher than in most health professions.²⁷

Compounding this problem, many new social workers are the first generation in their families to graduate college. In 2019, for example, more than 46% of the MSW graduates were the first ones in their families to graduate college; this was particularly true for Blacks/African Americans (57%) and Hispanic/Latinos (73%).²⁸ This suggests that as a profession, they are relatively unlikely to have family resources that can help repay the debt—about one third reported receiving financial support from their families. As one first generation college (and then graduate) student explained, her family was unable to

²⁶ 2022-2023: *The State of Social Work Education in the United States*, Council on Social Work Educ. 2 (2024), https://www.cswe.org/getattachment/61b4f594-6109-43f7-9acd-49b6e9cd5131/cswe_2022-2023-summary-of-the-us-annual-survey-of-social-work-programs.pdf/.

²⁷ Salsberg, *supra* note 18, at 17.

²⁸ *Id.*

contribute financially to her education. She is now working as a clinical social worker supporting burn survivors—but her outstanding student debt, after more than a decade of work and repayment, is still more than double her annual salary.

Unsurprisingly, the debt burden is not distributed equitably within the profession either. Debt from their social work education is substantially higher for new social work graduates who are Black/African Americans (averaging \$92,000 compared to an average of \$67,000 for White graduates, for attainment of both bachelors and master’s degrees) and for Hispanics (averaging \$79,000).²⁹ Female social workers also had higher mean debt from their social work degree than did their male counterparts.³⁰ The student debt crises experienced by social workers magnifies historic economic inequalities, perpetuating the inequitable distribution of resources.

Meaningful student debt relief is essential to support social workers and to keep the profession financially accessible.

For many social workers, loan forgiveness is the only realistic way out of this significant debt. As our members have told the Department, despite their best efforts, it is not realistic to pay off what is frequently more than \$50,000 in student debt at their salaries. For those with even higher debt burdens, sometimes beginning at more than \$100,000 in student loans, they have seen their total debt double to more than \$200,000 despite consistent payments.

For social workers facing this debt burden, federal debt relief is essential to continue in their profession. Many of our members accept the lower salaries provided for public service about which they are passionate, relying on the promise of loan forgiveness, while others feel “stuck in a low paying job because I am holding out to have my \$100k forgiven... terrified I will stay in this low paying position for 3 more years only to be denied.” Others worry that despite their passion for the work, they will not be able to “sustainably continue to work [in social work] without the help of [PSLF].”

The unbearable debt burden has pushed nonprofit and government-employed social workers into the private sector or out of the profession. As one of our members explained, she had been working in community-based non-profit agencies treating mental health and substance use disorders in West Virginia for over ten years but was denied PSLF because of her payment plan. She explained that “[u]pon learning that none of the payments ... that I had made over those 12 years would qualify for PSLF, and that in order

²⁹ *Id.* at 12.

³⁰ *Id.* at 32.

to be considered I would have to restructure my payment plan and go back to the beginning to make 120 payments over 10 years, I decided to leave the community based non-profit sector and now work in a private practice instead.” Similarly, another explained that, after ten years of repayment, when many loan payments were deemed ineligible for PSLF, “I left a job I truly cared about [in a Community Mental Health Center], a community that needed workers like myself, all because I could not afford to keep paying my student loans with the income I was bringing in.”

As one of our social workers explained:

If I’d known that [the PSLF] program would not provide the promised forgiveness, *I likely would have chosen a different profession*. The financial hardship of low pay and high debt contributes to burnout in our field. The mental health field is crucial to the people of our country, yet this program that was supposed to allow more people to go into public service has been functionally weakened to the point of insignificance. I am an excellent mental health clinician and the field would lose out if I were not in it. Yet I am now 49 years old, and I will be paying these loans for the rest of my life and will likely die with a huge portion unpaid. (Emphasis added).

NASW supports the Department’s proposal, but also encourages the Department to modify some aspects.

Each of the provisions in the Department’s Proposal as drafted would likely provide relief to many valued members of our profession:

- The proposed §§ 30.81-82 would provide meaningful relief to the many social workers whose outstanding loan balances exceed the amount owed when they first entered repayment;
- The proposed § 30.83 would provide substantial relief to the many social workers who have already been laboring under the pressure of student loans for decades, and fear decades more of repayment without ever obtaining freedom from their debt;
- The proposed § 30.84 would provide substantial relief to the many social workers whose salaries are low enough to qualify for an IDR plan, but who may not have successfully navigated the complex process of applying for this relief;
- The proposed § 30.85 would similarly provide substantial relief to many social workers who may have qualified for other loan discharge, cancellation, or forgiveness opportunities but had not successfully

navigated the process of becoming aware of and applying for such opportunities;

- The proposed §§ 30.86, 30.87, and 30.88 would provide relief to social workers who undertook their studies at institutions that didn't provide value to their students, but still took their money, leaving them in debt for years to come;
- The proposed §§ 682.403 would ensure that many of the social workers who fall into the categories above can still obtain relief if their loans are held by private loan holders or guarantee agencies.

In addition, NASW applauds the Department's work to design these proposals to provide or simplify automatic relief to borrowers who qualify, rather than setting up an unnecessary and complicated application system for relief that could deter many eligible borrowers.³¹

With respect to § 30.82, while NASW believes that it will provide important relief to borrowers as written, NASW believes based on the experience of our members that some of the Department's analysis about the proper scope of the program is misguided. The Department's \$20,000 cap on the waiver authority in § 30.82 reflects the Department's assumption that "borrowers with larger loan balances have greater earnings potential than those with lower loan balances."³²

As discussed above, NASW's members work in a profession where a master's degree is a requirement for clinical social work; however, social worker salaries are typically lower than other disciplines that require a Master's degree. We ask the Department to consider raising (or eliminating) this cap in recognition of the acute challenges associated with repaying balances that have grown far beyond their initial loans.

With respect to § 30.83, NASW asks the Department to consider making this benefit permanent on a rolling basis, so that it goes beyond one-time relief for borrowers with

³¹ See 89 Fed. Reg. at 27,574 (automatic administration of proposed § 30.82), 27,577-78 (creating a process for automatic recertification of IDR enrollment under proposed § 30.84), 27,578-79 (automatic waiver of loans under § 30.85), and 27,584-86 (automatic waivers for students at ineligible institutions).

³² 89 Fed. Reg. at 27,574.

loans from 2005 (or 2000), while providing no relief to borrowers with loans from 2006 (or 2001).

NASW supports as much relief to struggling borrowers as possible. We further encourage the Department to consider finding avenues for additional relief for public service professionals, particularly those who do not qualify for the PSLF program because of the tax status of their employer, and Parent Plus borrowers. We also encourage the Department to consider finding avenues for additional relief for borrowers who are retired and for whom student debt is reducing their social security benefits.

Conclusion

We support the Department's work to use a range of authorities to provide student loan debt relief for social workers and thank you for the opportunity to share feedback. If you have any questions or would like to discuss the information in this comment, please contact Aman T. George or Robin F. Thurston, Democracy Forward Foundation, Counsel for NASW, at (202)701-1783 or ageorge@democracyforward.org.

Respectfully submitted,



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