



February 13, 2017

U.S. Department of Education
Director of Information Collection Clearance Division
Acting Director Kate Mullan
LBJ Education Building, Room 2E-347
400 Maryland Ave SW
Washington, DC 20202

Re: Docket No. ED-2016-ICCD-0144, Application and Employment Certification for Public Service Loan Forgiveness

Dear Ms. Mullan:

Thank you for the opportunity to comment on the Public Service Loan Forgiveness (PSLF) program information collection by the U.S. Department of Education (ED) referenced in the *Federal Register* on December 15, 2016 (Docket No. ED-2016-ICCD-0144). Congress established the PSLF in 2007 to encourage student borrowers to work in the public sector. Qualifying borrowers may have their Direct Loans forgiven after 10 years of full-time service in an eligible job. Qualifying employers include federal, state, local or Tribal governmental organizations and tax-exempt 501(c)(3) not-for-profit organizations. The first cohort of borrowers to qualify for the PSLF will be eligible for loan forgiveness beginning in October 2017.

About AVMA

As one of the oldest and largest veterinary medical organizations, with more than 89,000 member veterinarians worldwide engaged in a wide variety of professional activities and dedicated to the art and science of veterinary medicine, the mission of the AVMA is to lead the profession by advocating for its members and advancing the science and practice of veterinary medicine to improve animal health and welfare and human health.

Early Career Veterinarians & PSLF

Early career veterinarians are more inclined to choose careers in public service – forgoing more lucrative careers in private practice – when they are able to manage educational debt. The existence of the PSLF plays an important role in the decision-making process of veterinarians weighing career paths in public service following graduation.

Federal and state governments have a graying workforce and face impending retirements that must be filled by highly educated, highly skilled professionals. Government agencies at all levels and non-profit agencies need the PSLF to attract veterinarians to fill essential positions in animal health and welfare, food safety, animal disease surveillance and eradication, diagnostic medicine, as well as agricultural and biomedical research.

While we do not know how many of our members are counting on the PSLF, we are aware that many early career veterinarians employed by the U.S. Army Veterinary Medical Corps, the U.S. Department of Agriculture's Food Safety and Inspection Service, the Animal and Plant Health Inspection Service, the U.S. Food and Drug Administration, the Centers for Disease Control and Prevention, the Department of Homeland Security and other federal and state agencies opted for jobs in the public sector because the PSLF was an option that would help make their career path viable.

AVMA members have indicated several concerns with the current PSLF program and we offer suggested changes to improve the implementation of the program and provide assurance for the continuation of the program.

PSLF Application and Certification Process

The PSLF application and certification can be improved by utilizing one electronic form – streamlined, straightforward, unambiguous, and simple to complete and submit. Electronic submission would reduce confusion, speed processing and make the system more efficient. ED could then send an automated response to the borrower letting them know their application and certification were received, are under review, and are being processed.

To better understand the demand and utilization of the program applications should require borrowers to provide the name of their matriculating universities, employer, majors and degrees, gender, and birthdate. ED should provide quarterly updates on demographic data associated with the PSLF as well as the amount of loan dollars scheduled to be forgiven each month; applications and certifications submitted and processed. Alternatively ED should maintain a publicly searchable database that includes this information as well as city, state, matriculating university, employer, by major and degree, and by gender and age of participants.

To reduce the applicant confusion pertaining to level of debt forgiveness, the application should include a clear statement that all of a borrower's outstanding loan balance will be forgiven if the application is accepted. In addition, upon completion of the required years of public service, ED should require the sole loan servicer of PSLF, FedLoan Servicing, to notify borrowers of their PSLF eligibility if they have made 120 qualifying payments and have not yet applied for forgiveness.

In the event an application is rejected, ED should describe the reasons why and provide the applicant with an opportunity to rectify those issues resulting in the rejection.

Definitions

AVMA asks that ED explicitly add veterinarians to the list of public health occupations.

Long-term Commitment to PSLF Participants

Veterinarians participating in PSLF, and those who hope to, are concerned about the future of the program during the term of their public service. Our members currently participating in PSLF have noted they have provided public service for significantly reduced income and are counting on the program being there when they have fulfilled the terms of service. AVMA is aware of proposals calling for changes to PSLF, to cap the amount that can be forgiven and to eliminate the program altogether. Efforts to cap PSLF forgiveness will negatively impact veterinarians providing much needed services to rural America's underserved areas, critical services in animal disease and surveillance activities as well as those practicing shelter medicine and working to protect animal welfare. AVMA urges ED to take steps to maintain PSLF and honor the "contract" it has entered into with participants who have already dedicated years of their lives to careers in public service. Qualified employers need PSLF in their toolbox to compete for highly educated, highly skilled veterinary graduates.

Thank you again for the opportunity to comment on the creation of a PSLF application and revisions to the Employment Certification Form. If you have any questions or require additional information, please do not hesitate to contact Gina Luke, Assistant Director, Governmental Relations Division, at 202-289-3204 or via e-mail to gluke@avma.org.

Sincerely,



Janet Donlin, DVM, CAE
Executive Vice President and CEO