



August 12, 2022

U.S. Department of Education  
400 Maryland Ave. S.W.  
Washington, DC 20202

Docket ID ED-2021-OPE-0077

*Student Assistance General Provisions, Federal Perkins Loan Program, Federal Family Education Loan Program, and William D. Ford Federal Direct Loan Program*

On behalf of the American Library Association (ALA), which represents the nation's 117,000 libraries of all types—including school, public, community college, college & research, tribal and other libraries—we submit these comments. An advanced degree is a standard requirement for a certified librarian position meaning that many librarians serving in positions of public service are student loan borrowers.

According to the Bureau of Labor Statistics, employment for librarians and library media specialists is projected to grow nine percent from 2020 to 2030. A review of currently available librarian positions shows that an advanced degree is a common requirement. A sample of library position openings and degree requirements for August 2022 include the following:

- Research Librarian based in Washington, DC requiring a master's degree in Library Science
- Special Collections Librarian in Seattle, WA, requiring a Master of Information and Library Science
- Public library branch Library Director in Richmond, IN, requiring a graduate degree in Library Science
- Academic Assistant Professor/Collection Management Librarian in Hattiesburg, MS, requiring a master's degree in Library Science
- School Librarian position with Fort Bend, TX, Independent School District requiring a master's degree in Library and/or Library Science.

The ALA supported the creation of PSLF in 2007 and we welcome the department's proposed improvements to PSLF which will streamline the process for borrowers. Earlier this year, ALA joined a coalition letter submitted to ED noting that "Congress, in a bipartisan fashion, made a promise more than a decade ago that public service workers who choose to give back to their communities and our country wouldn't be locked in a lifetime of debt ... It is clear, however, that this promise has been broken. Since the first public service workers became eligible for debt cancellation in 2017, 98 percent of those who applied have been rejected." We applaud the Department for listening to librarians and many others and offering these improvements. We are hearing from our members that the temporary waiver and other changes already implemented by the Department are beginning to prove fruitful as more librarians are receiving word of loan forgiveness.

ALA offers the following comments.

### **Qualifying Employer**

- Under Qualifying Employer and Definitions for PSLF, the Department proposes adding new definitions and modifying some existing definitions in § 685.219(b) to clarify what are "qualifying employers" and "full-time" work under PSLF...which would add 11 definitions including: non-governmental public service, public library services, and school library services. ALA strongly supports inclusion of these definitions. Expanding the HEA definition of public library sciences and school-based library sciences to public library services and school library services will help eliminate confusion for loan borrowers and employers.

### **Contractors**

- The Department seeks comments on addressing contract employees in relation to eligibility of PSLF. ALA notes that it is not uncommon for librarians to be hired on a contractual basis from a non-qualifying employer, such as a for-profit entity, but provide library services and would otherwise qualify for loan forgiveness. For example, some federal agencies hire for-profit contractors to provide in-house library services. These contract employees are providing traditional duties that would otherwise make them qualified for loan forgiveness. ALA urges the Department to ensure that contract employees providing library services be included in PSLF.

### **30 Hour Work Week**

- The Department proposes a definition of full-time including working in qualifying employment in one or more jobs at least an average of 30 per week. ALA supports this definition change which will add consistency as to what constitutes full-time work and eliminate employer-based confusion that could jeopardize borrowers from accessing PSLF participation. Borrowers who work for employers that define full-time at 40 hours per week will now be eligible for loan forgiveness under this change. Further, ALA supports

the Department in recognizing that the definition of full-time should include at least 30 hours per week throughout a contractual or employment period of at least eight months in a 12-month period. This proposed definitional change would help school and academic librarians whose employment matches the school year calendar.

### **Reconsideration**

- The Department proposes a formal reconsideration process for loan borrowers. ALA urges the Department to include a formal reexamination process for borrowers seeking to contest a denial of forgiveness or rejection of previous payments that were not counted towards forgiveness. ALA agrees with the Department that “by formalizing and codifying a reconsideration process, borrowers would be able to officially request the Department take another look at their qualifying payment and/or qualifying employer eligibility through a process determined by the Secretary. The Department believes that 90 days from the denial notice is more than adequate time for a borrower to submit a reconsideration request.”

### **Deferment and Forbearance**

- The Department proposes to allow each month in which a borrower is in one of the listed deferment or forbearance periods to count as a month of payment for PSLF purposes if the borrower certifies qualifying employment for the period covered by the deferment or forbearance. The Department also would allow for a hold harmless period for loan borrowers who were working for a qualifying employer during periods of deferment or forbearance. ALA supports inclusion of these improvements which allow borrowers to count towards forgiveness additional previous non-payments during deferment and forbearance. In some cases, librarians have found their PSLF status jeopardized involuntarily due to cancer treatment, Peace Corps or AmeriCorps engagements, and other situations. This improvement will help ensure more librarians are able to fully participate in PLSF.

Libraries are long-standing community institutions that serve people of all backgrounds and circumstances, libraries are uniquely positioned to understand the services and support that are needed in their communities. Librarians take pride in working for highly trusted community institutions. With 117,000 libraries in the nation, there are libraries of every conceivable size, focus, and demographic composition. These include:

- Community college libraries, which often support not only digital equity but also career readiness and small business development, especially for covered populations
- College and research libraries that serve students in a covered population such as veterans, first-time college students in a family, and people with disabilities
- Public libraries serving communities of all sizes, from small towns to large cities

- Tribal libraries support digital equity, career readiness and small business development, preserve and promote the cultural heritage
- K-12 school libraries serve the curricular, learning and information needs of students, and
- Every other kind of library, especially state libraries, public law libraries, and more.

Our members become librarians for many reasons. Some become school librarians to work with young students and foster a love of learning. Some are inspired to work with marginalized communities to help them overcome hardships and find jobs. Some are dedicated to research and access to information. But being a librarian personifies community service and Public Service Loan Forgiveness helps make this goal a reality for many. We strongly support these proposed regulations.

Thank you for considering our views on this topic.

Sincerely,

A handwritten signature in black ink that reads "Kevin Maher". The signature is written in a cursive, flowing style.

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