# Public Service Loan Forgiveness (PSLF) FAQs for Washington State Agencies

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# What is the PSLF Contact's role?

Washington state agencies are encouraged to have a PSLF Contact listed in the <u>Washington state agency</u> <u>directory of PSLF contacts</u>. This contact is responsible for maintaining an updated email address in the directory and ensuring that resources like PSLF eligibility letters have current contact information.

The PSLF Contact is in charge of filling out Sections 4 and 5A of the <u>PSLF form</u> as requested by current and former employees. They must track all PSLF employment certification forms completed for employees from July 1, 2023, including forms they complete themselves and ones signed by authorized signers. The PSLF Contact receives program and resource updates from OFM at <u>PSLF@ofm.wa.gov</u>. The PSLF Contact is expected to update agency resources, working with Human Resources and Communications Directors, and other appropriate agency stakeholders.

# PSLF ELIGIBILITY

## Which employees are eligible?

The PSLF program offers loan forgiveness for public service workers in government (including federal, state, tribal, and local government) or non-profit organizations. Unlike other programs, eligibility is determined by employer rather than by job.

## Do part-time employees qualify?

To qualify for PSLF, employees must work a minimum of 30 eligible hours per week. For part-time faculty at higher education institutions, PSLF hours are calculated by multiplying in-class teaching hours by at least 3.35. Employers have discretion to round up, in favor of the employee, in keeping with the federal PSLF rules (<u>34 C.F.R. Sec. 685.219</u>). PSLF hours for all types of public service employees can be accumulated from either one full-time job or multiple part-time jobs with qualifying employers.

## Do contractors qualify?

Employees of contracted organizations, such as government contractors and for-profit organizations, generally do not qualify for PSLF. However, there is an exception for contractors of qualifying employers if specific state laws prevent direct hiring for positions or services.

The <u>manual PSLF form</u> and the <u>PSLF Help Tool</u> have been updated to include the exception for qualifying contractors. Please note, the U.S. Department of Education leaves the discretion up to the employer to determine if they have any qualifying contractors, as this exception is based off interpretation of state law. The PSLF employment certification process is the same for employees and qualifying contractors.

The PSLF Contact should coordinate with their agency's assigned program AAG to determine if this exception applies to their contracted employees. After confirming with their program AAG that their agency has qualifying contractors, the PSLF Contact should promptly email OFM at <u>PSLF@ofm.wa.gov</u>. The PSLF Contact should also begin sending qualifying contractors PSLF eligibility letters at the same cadence as required for regular employees.

# PSLF ELIGIBILITY LETTER TEMPLATES

#### How should I send out PSLF eligibility letters?

Agencies can choose electronic or printed letters, although electronic is recommended in most cases. For electronic letters, use the "for web" versions with hyperlinks. For printed copies, use the "for print" versions with complete web addresses. Agencies can download and customize letter templates from the <u>OFM PSLF webpage</u> with their own agency name and PSLF Contact email. As a best practice, agencies should share the annual PSLF eligibility letter on their intranet site for easy employee access.

#### Do I need to send a PSLF eligibility letter to every employee?

Agencies should distribute these letters to all employees, irrespective of full-time status, as part-time employees can qualify for PSLF by working multiple part-time jobs for qualifying employers.

#### What do I need to do for separated employees?

Agencies must give separated employees a PSLF eligibility letter during the separation process.

# PSLF EMPLOYMENT CERTIFICATION PROCESS

## Is PSLF employment certification the same as verification of employment requests?

The PSLF form is only for the PSLF program and there are key differences between verification of employment forms and PSLF forms. These differences include the form itself, who signs the forms, and how employment hours are calculated. PSLF Contacts are responsible for signing PSLF forms and may or may not also handle VOE requests.

## Who is responsible for submitting PSLF forms to the PSLF servicer?

For forms submitted through <u>PSLF Help Tool</u>, the tool will automatically send the form to FSA for processing.

For <u>manual PSLF forms</u>, the employer can either return the form to the employee or send it to FSA for processing. PSLF forms should be sent by mail to U.S. Department of Education, P.O. Box 300010, Greenville, TX 75403, or by fax to 540-212-2415.

## What information can I edit on PSLF forms received through DocuSign?

Employers are only able to edit the following questions and fields on Section 4 of the PSLF form:

- Employment Begin Date,
- Employment End Date or check/uncheck the "Still Employed" box, and
- Employment Status to select full-time or part-time.

For any other changes, employers must contact the employee using the email and phone number on page 1 of the PSLF form and direct the employee to resubmit a corrected PSLF form for processing.

#### What if the employee's name on the PSLF form is different than my agency's records?

When the employee uses the <u>PSLF Help Tool</u>, the automatically generated form will have the employee's information associated with their federal student loans. There may be differences in names and addresses on the form. Verify the employee's social security number and date of birth with your agency's records. If unsure, contact the employee directly to confirm the PSLF certification request.

#### What if I receive a PSLF form with employment gaps and/or multiple employers?

For a PSLF form with breaks in service or multiple employers, separate forms need to be filled out for each employer or period of employment. If multiple dates of service or employers are noted on a single form, please reject the form and request the employee to resubmit separate forms for processing.

#### Other than the PSLF Contact, who else can sign PSLF forms?

Agencies have the authority to decide who qualifies as "authorized signers." They need to determine whether they allow individuals other than the designated PSLF Contact to sign PSLF employment certification forms. There are two choices for agencies in dealing with this matter:

Option 1: Agencies may choose to only allow the PSLF Contact to sign PSLF employment certification forms. In this case, agencies should instruct individuals receiving these forms who are not the designated PSLF Contact to email the employee and request that they resend the form to the PSLF Contact, providing the correct email address.

Option 2: An agency can allow supervisors or other agency leadership to sign and receive PSLF employment certification forms. In this case, the signer must have access to their agency's HR records management system to verify employment dates and average weekly hours. After signing, the authorized signer should save a copy of the PSLF form in the appropriate location and notify the PSLF Contact so they can update their agency's PSLF employment certification records. See the answer to "What records do I need to retain?" below for more details on how to handle PSLF records.

# RECORDS RETENTION AND TRACKING

## What do I need to track?

As of July 1, 2023, agencies are responsible for implementing PSLF employment certification tracking. The key pieces of information agencies are required to track include:

- personnel number,
- employee name,
- the last date the employer completed a PSLF form for their employee.

This information should be tracked to help agencies know when to remind employees to request PSLF employment certification on an annual basis. At this time, agencies have the discretion to determine where and how to track PSLF employment certifications but must adhere to the records handling and retention requirements outlined below.

## What records do I need to retain?

There are two records that are generated for the PSLF program that agencies should retain copies of:

- 1. The signed PSLF form.
- 2. The agency's PSLF employment certification tracking document or system.

The PSLF Contact or other "authorized signer" of the PSLF form should capture a copy of the form at the time of signing for the agency's record. PSLF records should be treated as "category 4" data, which is considered "confidential information requiring special handling" under the federal Privacy Act. Redisclosure would need to be consistent with <u>Office of the Chief Information Officer (OCIO)</u> requirements, as well as the federal Privacy Act notice.

PSLF records must be kept securely and confidentially in an administrative file. After an employee leaves, the file should remain with the employer. PSLF Contacts and authorized signers should talk to their agency's Chief Information Security Officer about safeguarding category 4 data to ensure compliance and ideal levels of security for storing and handling PSLF records.

Keep PSLF records as per the "Benefits Enrollment and Participation (DAN GS 03048) in the State Government General Records Retention Schedule." This means they need to be retained for 6 years after the date of separation from the agency, or 6 years after withdrawal from participation, whichever is sooner, then destroyed.

#### Will there be an auditing process in the future?

No, OFM will not be conducting any formal auditing of agencies' PSLF records.