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**EDCAP Internal Guidelines for PSLF Clients**

**As Of January 24, 2022**

* **For clients pursuing PSLF under the Original Plan rules:**
* They have never had anything other than Direct Loans
* They have always been enrolled in the right repayment plans (IDR or Standard 10 Year Fixed) and do not need to have loans reviewed under the Waiver rules:
  + 1. If loans are already with FedLoan, they can file the PSLF Certification & Application Form to have the payment count updated at any time.
    2. Borrowers who qualify for PSLF but are NOT with FedLoan and do not need to have their loans reviewed under the Waiver rules (i.e., they are newer to the workforce or may only have qualifying payments while in the covid forbearance) should wait until MOHELA is up and running before filing their PSLF Certification & Application Forms.
  + Guidance is that ED will be looking to transition loans away from FedLoan sooner rather than later. FedLoan is also very backed up and clients are waiting 2-3 hours trying to get hold of them. Any loans sent to FedLoan for PSLF review will eventually be sent to Mohela. As a result, we are only directing clients who are not already with FedLoan to send their loans there now if they really have to (i.e. for review under the Waiver rules or if you think you are very close to or already have accumulated the 120 qualifying payments).
  + **Consult EDCAP staff if you are unsure how to guide your client.**
* **For clients looking to take advantage of the Temporary Waiver Opportunity (through 10/31/2022):**
  + They had the wrong loan types (FFEL, Perkins or Other Non-Direct Loans)
  + They were enrolled in the wrong repayment plans (Extended versions of the Standard 10 Year Fixed or Graduated Plans)
  + They met the employment requirements while paying on loans that were subsequently consolidated
  + Note: Parent borrowers are NOT ELIGIBLE for the Temporary Waiver!
    1. If they have Direct Loans, the servicer is currently FedLoan and they have some qualifying payment credit, no action is required! Their loans will be automatically reviewed. However, they can submit the PSLF Certification & Application Form to update their eligible payment count at any time.
    2. If they have Direct Loans but have never submitted the PSLF Certification & Application Form before, they should submit this form to FedLoan, regardless of who their servicer is.
    3. All Non-Direct loans need to be consolidated into Direct Consolidation Loans first before a PSLF Certification Form is filed:
       - If they only have Non-Direct Loans all at the same servicer- Consolidate and request they be assigned to FedLoan Servicing for now. Once the consolidation is complete, file the PSLF Certification & Application Form.
       - If they have a combination of Direct Loans and Non-Direct Loans all at the same servicer-**Consolidate the Non-Direct Loans Only**. Request they be assigned to the existing servicer. Once the consolidation is complete, file the PSLF Certification & Application Form. All the loans will then be transferred (if necessary) to the PSLF loan servicer and you will avoid leaving the client with two different servicers.
       - If they have a combination of Direct Loans and Non-Direct Loans at different servicers-**Consolidate the Non-Direct Loans Only** and request they be assigned to the same servicer as the Direct loans. Once the consolidation is complete, file the PSLF Certification & Application Form. All the loans will then be transferred (if necessary) to the PSLF loan servicer and you will avoid leaving the client with two different servicers.
  + **MOHELA has been named as the successor PSLF servicer to FedLoan.** However, they are not currently managing PSLF portfolios. We expect that to happen later this year.  **Until further notice, all requests for PSLF review must go to FedLoan.**
* If applications and/or consolidations are not completed before FedLoan exits the business, they will be forwarded to the new PSLF loan servicer. Follow up will be required.
* All Certification Forms and Direct Consolidation Loan (DCL) Applications filed for the purpose of being reviewed for the PSLF Temporary Waiver Opportunity must be submitted by **October 31, 2022.**
* The following requirements did not change for the Temporary Waiver Opportunity:
  + [Borrower must be employed full time by a qualifying employer](https://studentaid.gov/manage-loans/forgiveness-cancellation/public-service#qualifying-employer)
  + Borrower’s loan status must be “in-repayment” except for Active-Duty Military who will get credit for periods spent in deferment or non-covid related forbearance. Suspended payments in the COVID Forbearance from 3/13/2020-5/1/2022 which will count for all borrowers who meet other program requirements.
  + The number of qualifying payments required to receive PSLF is 120.
  + Only payments made on or after October 1, 2007 count.