



PHYSICIAN ASSISTANT EDUCATION ASSOCIATION  
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**Written Statement of the Physician Assistant Education Association  
Department of Education - Negotiated Rulemaking  
June 28, 2021**

The Physician Assistant Education Association (PAEA), representing the 273 accredited physician assistant (PA) programs in the United States, welcomes the opportunity to submit comments in advance of negotiated rulemaking pertaining to the Public Service Loan Forgiveness (PSLF) program.

PAEA is a committed member of the PSLF Coalition, an alliance of more than 90 organizations dedicated to preserving PSLF as a critical incentive to support the well-being of communities throughout the nation. Since the program's establishment in 2007, PSLF has motivated borrowers among the 10,000 PA students who graduate each year to expand access to care in medically underserved communities. Because of the significant cost of health professions education, PA students graduate with an average of over \$107,000 in student loan debt from their graduate education alone, not inclusive of outstanding undergraduate debt.<sup>1</sup> This heavy debt burden influences graduates' specialty and location choices – often dissuading them from choosing careers in lower-paying primary care settings – a concern that Congress recognized with the creation of PSLF more than a decade ago.

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<sup>1</sup> Physician Assistant Education Association. (2020). *By the Numbers: Student Report 4: Data from the 2019 Matriculating Student and End of Program Surveys*. <https://paeaonline.org/wp-content/uploads/imported-files/student-report-4-updated-20201201.pdf>.

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In a recent survey conducted by PAEA, over 36% of graduating PA students intending to enter either a federal or state loan forgiveness program reported interest in PSLF – a large potential workforce for non-profit practice settings that provide care to the nation’s most vulnerable patients.<sup>2</sup> In spite of this significant level of interest in PSLF, the barriers faced by borrowers dramatically limit the potential of the program and range from the program’s strict eligibility requirements to inaccurate and untimely guidance provided by loan servicers. The failure of approximately 98% of PSLF applicants to successfully receive loan forgiveness represents a substantial threat to both the integrity of PSLF and the promise of the program to expand access to care in underserved communities.<sup>3</sup>

As the Department seeks to amend existing PSLF regulations, it is critical that any changes shift course from the narrow and arbitrary administrative practices that have characterized the program’s history. Instead, improvements should conform with congressional intent that PSLF be a broad-based, easily accessible loan forgiveness opportunity for public service professionals. To this end, PAEA recommends the following changes be implemented via the negotiated rulemaking process.

To the extent allowable under current law, the Department must ensure that all borrowers who are placed into a non-qualifying repayment plan, but who otherwise meet all other eligibility requirements, have their payments count for the purposes of PSLF. For current program participants, the Department should amend existing regulations to create a more consistent and transparent appeals process for borrowers initially determined to be ineligible for PSLF. The Department should further require FedLoan Servicing to provide timely and detailed guidance to borrowers who submit the PSLF certification form, but who are not making qualified payments, about the steps necessary to qualify. Finally, for graduates who are able to obtain employment quickly following the completion of their programs, the Department should allow interested PSLF participants to opt out of the post-graduation

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<sup>2</sup> Physician Assistant Education Association. (2019). *By the Numbers: Student Report 3: Data from the 2018 Matriculating Student and End of Program Surveys*. <https://paeaonline.org/wp-content/uploads/imported-files/sr3-program-report-20190814.pdf>.

<sup>3</sup> Federal Student Aid. (2021). Public Service Loan Forgiveness Data. <https://studentaid.gov/data-center/student/loan-forgiveness/pslf-data>.



grace period and start making qualifying payments early. These changes will better align the administration of PSLF with congressional intent and allow the Department to fulfill the program's promise of expanding access to care provided by PA graduates and other public service health professionals.

PAEA appreciates the opportunity to submit comments and looks forward to the opportunity to serve as a resource to the Department on both PSLF and other higher education issues. Should you require additional information or have questions, please contact Tyler Smith, Director of Government Relations, at [tsmith@PAEAonline.org](mailto:tsmith@PAEAonline.org) or 703-667-4356.