

**Congress of the United States**  
**Washington, DC 20515**

August 11, 2022

The Honorable Miguel Cardona  
Secretary  
Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Dear Secretary Cardona,

As you review feedback to the proposed regulations on the Public Service Loan Forgiveness (PSLF), we write to express support for the proposed expansion of the definition of a qualifying employer to include Veteran Service Organizations (VSOs).

The PSLF program currently defines a qualifying employer as any government agency or a nonprofit tax-exempt under section 501(c)(3) of the Internal Revenue Code. A non-profit organization that is not tax exempt under section 501(c)(3) can also be eligible if it provides a qualifying service, including emergency management, military service, public safety, law enforcement, and public health. However, this definition currently excludes the employees of most VSOs. Even if VSO employees work in the same facilities as federal employees, they may not be eligible for loan forgiveness.

Legislative efforts are underway to ensure VSO employees are eligible for PSLF. For example, H.R. 7470, the *Veteran Service Equity Act*, would expand the definition of a public service job to include full-time employment at an organization recognized by Department of Veterans Affairs for the representation of veterans under 38 USC 5902. However, the Department of Education must use its regulatory authority to ensure VSO employees are eligible for PSLF as soon as possible.

On July 13, 2022, the Department of Education released a notice of proposed rulemaking that included “civilian service to the military” as public service under the PSLF program. The proposed rule defines civilian service to the military as “providing services to or on behalf of members, veterans, or the families or survivors of deceased members of the U.S. Armed Forces or the National Guard that is provided to a person because of the person’s status in one of those groups.”<sup>1</sup> We encourage the Department to proceed with this definition to ensure that VSO employees receive the loan forgiveness they have earned.

VSO employees help veterans navigate the complex bureaucracy of the VA and gain access to the benefits they have earned for serving their country. They provide a true public service to our nation’s heroes, and they should receive loan forgiveness for their work. As you consider changes to the Public Service Loan Forgiveness program, we urge that you expand the definition of a qualifying employer to include VSOs.

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<sup>1</sup> Federal Register, <https://www.federalregister.gov/documents/2022/07/13/2022-14631/student-assistance-general-provisions-federal-perkins-loan-program-federal-family-education-loan>

Sincerely,



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Mike Levin  
Member of Congress



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Katie Porter  
Member of Congress



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Rick Larsen  
Member of Congress



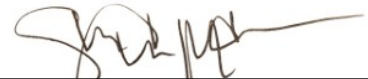
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Chris Pappas  
Member of Congress



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Ruben Gallego  
Member of Congress



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Sheila Cherfilus-McCormick  
Member of Congress



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Andy Kim  
Member of Congress



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Jahana Hayes  
Member of Congress



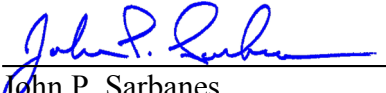
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Brian Fitzpatrick  
Member of Congress




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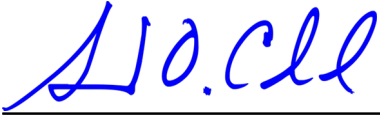
Anthony G. Brown  
Member of Congress



John P. Sarbanes  
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Sara Jacobs  
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Salud Carbajal  
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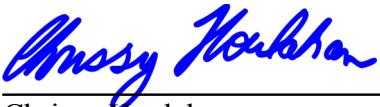
Jimmy Panetta  
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Conor Lamb  
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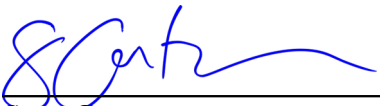
David N. Cicilline  
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