Memorandum for Heads of Executive Departments and Agencies

From: Kiran A. Ahuja
Director

Subject: Public Service Loan Forgiveness: Certification of Federal Employment for Federal Employees

The purpose of this memorandum is to inform Federal agencies that, for purposes of the Public Service Loan Forgiveness (PSLF) program, (1) a Federal agency may certify all Federal employment for a current federal employee, provided that the Official Personnel Folder (OPF) within the employing agency’s custody contains documentation confirming the Federal employment claimed, and (2) separated federal employees who inquire about certification of past federal employment should be directed to the National Personnel Records Center.

PSLF and the “Limited PSLF Waiver”

The Public Service Loan Forgiveness (PSLF) program forgives the remaining balance on federal Direct Loans after a federal student loan borrower has made 120 qualifying payments while working full-time for a qualifying employer.

On October 6, 2021, the U.S. Department of Education (ED) announced a temporary change to the PSLF program rules as a result of the COVID-19 national emergency. This “limited PSLF waiver” allows borrowers to receive credit for past periods of repayment that would otherwise not qualify for PSLF. The time-limited opportunity ends on October 31, 2022, after which normal PSLF rules will apply.

More information regarding eligibility and requirements is available on ED’s website.

Certification of Qualifying Federal Employment: Current Federal Employees

To qualify for PSLF, a borrower must have qualifying employment during the past periods of repayment. The federal government is a qualifying employer, and therefore federal employees can take advantage of PSLF, including the “limited PLSF waiver.”

The PSLF documentation that a borrower must submit contains a section for an employer to certify that the borrower worked for the employer during the period of time claimed. To assist current federal employees with submitting this documentation, OPM previously has recommended that agencies provide employees with an agency point of contact who will sign the necessary employment certification form.
To further assist federal employees, OPM recommends that employing agencies certify their federal employees’ prior federal service performed at another federal agency, if the OPF within the employing agency’s custody contains documentation confirming the federal employment claimed. In these circumstances, an agency official is considered an “authorized official” as defined in Section 6 of the PSLF form. The federal employee should present a separate PSLF form for each federal agency and period of employment for which they are seeking certification and the agency official should certify each form as appropriate.

Agencies are authorized to certify prior service in Section 4 of the PSLF form pursuant to OPM’s regulations governing federal employee Official Personnel Folders (OPFs). Employing agencies that are subject to 5 CFR part 293 are responsible for establishing an OPF, as well as maintaining any previously established OPFs, consistent with OPM regulations and policy. See e.g., 5 CFR 293.303(c) – (e). As set forth in OPM’s regulations, agency responsibilities with respect to OPFs include transferring the OPF to the newly employing agency when an employee transfers to a new agency, after which the new agency is responsible for responding to all information requests from a current employee’s OPF. 5 CFR 293.306, 293.307, 293.310 and 5 CFR 297.105(d).

Agencies are advised to assist with proper form processing by ensuring that certifications are in an acceptable format such as a wet signature or a photo of a hand-drawn signature. For more information about acceptable signatures, please review this blog.

Agencies are also advised to help ensure that employees have used the correct Employer Identification Number (EIN) in section 3 of the PSLF form for each agency that the employee is seeking to certify. Note that agencies may have a different EIN for non-payroll purposes and the EIN that should be used on the form is the EIN used for payroll purposes.

A list of agencies and the EINs used for payroll purposes is attached. If the EIN provided by the employee in section 3 is not found on the attachment provided, it could still be eligible as a federal agency. To check this, visit https://studentaid.gov/pslf/employer-search and use the EIN and employment dates provided by the employee to look up the employer. If the results include the name of the employer on the form with a status as “eligible,” you can proceed to certify the form if the documentation you have confirms the dates of employment.

Certification of Qualifying Federal Employment: Former Federal Employees

The National Personnel Records Center (NPRC) will certify past federal employment for separated federal employees who no longer work for the federal government and who seek certification in connection to PSLF and the “limited PLSF waiver.” Any such employees can be directed to NPRC by one of the following methods:

By email: cpr.center@nara.gov
By fax: 618-935-3014
By USPS: Civilian Personnel Record Center
Correspondence Section
1411 Boulder Boulevard
Valmeyer, IL 62295
Prior to sending, separated federal employees should complete their portion of the certification form. If NPRC is in possession of a separated employee’s OPF, it will process the request and return the form to the address indicated on the form so that the separated employee may complete the application process.

If the employee is a recently separated employee and the agency still retains the employee’s OPF within the agency’s custody and it contains documentation confirming the federal employment claimed, the agency may certify employment for the separated employee.

cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, Human Resources Directors, and Work-Life Coordinators