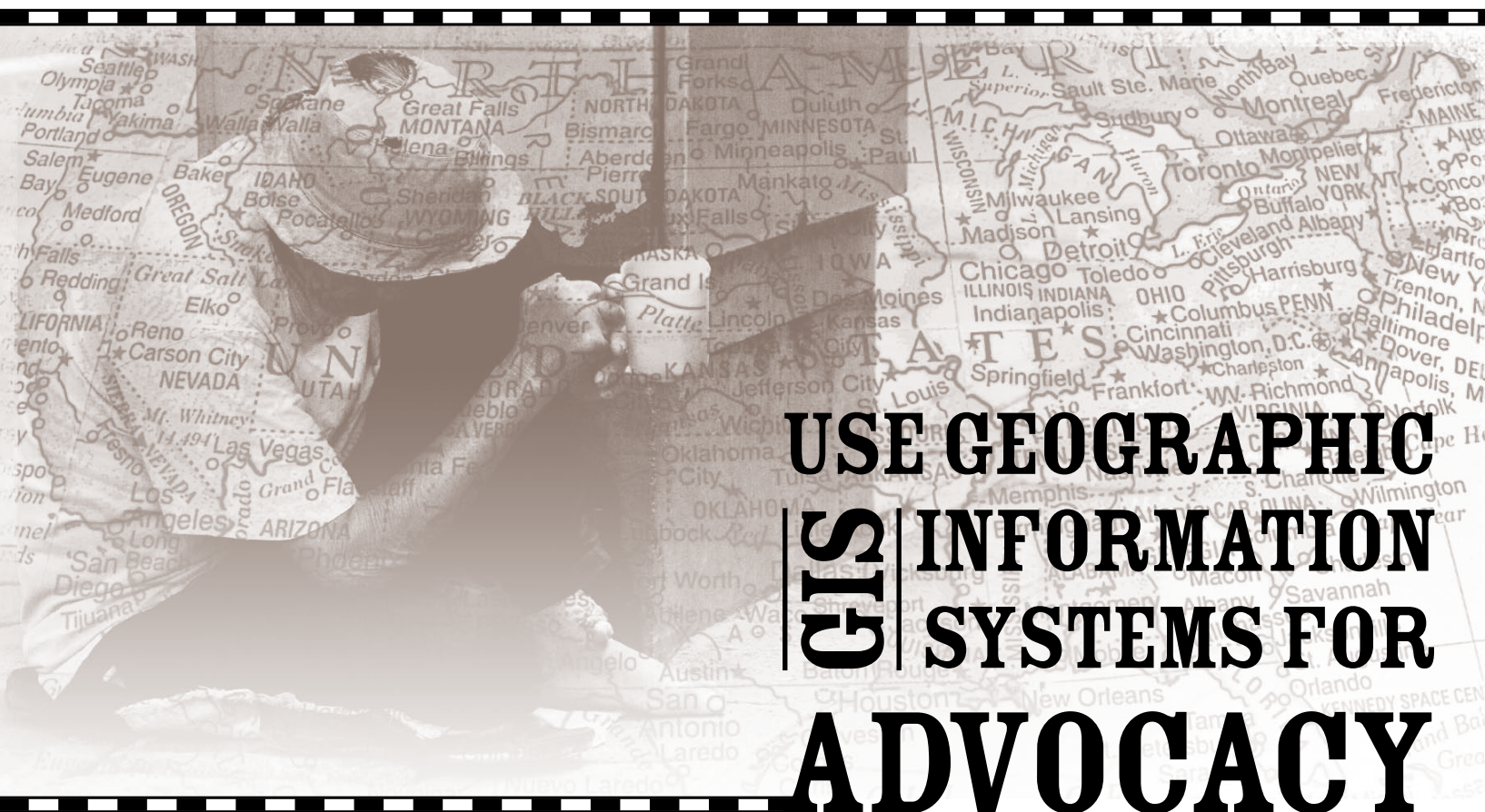


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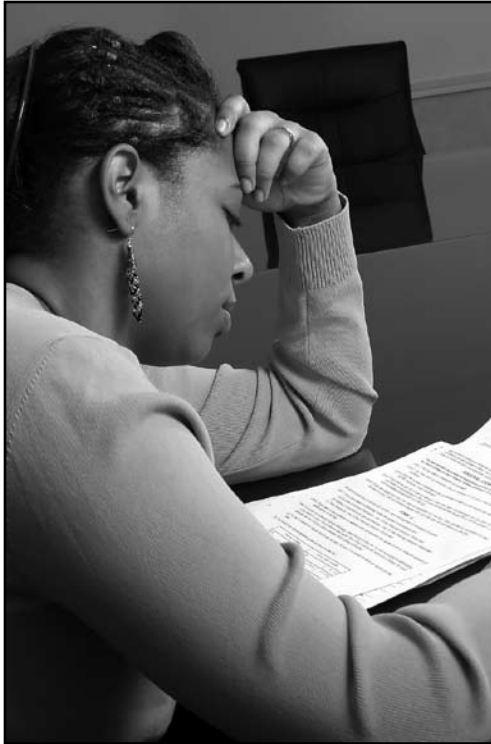


USE GEOGRAPHIC INFORMATION SYSTEMS FOR ADVOCACY

- Effects of Bankruptcy Code Reform
- Loan Forgiveness for Public-Interest Lawyers
- Supreme Court and Age Discrimination in Employment Act
- Shadow Reporting for Practitioners
- Three Phases of Justice
- Supreme Court's Latest on Federal Court Access
- Human Development Report on America



Sargent Shriver National Center on Poverty Law



How the College Cost Reduction and Access Act of 2007 Can Benefit You

Public Service Loan Forgiveness and Income-Based Repayment

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The College Cost Reduction and Access Act of 2007 is one of the most significant breakthroughs for public interest lawyers in a generation.¹ For many years, student debt has been a major obstacle for public interest-minded lawyers. The Act helps public interest lawyers (and others with high educational debt) by creating an opportunity for lowered payments on federal student loans and offering loan forgiveness after ten years of public service employment.

For example, new law graduates who have average debt and are earning typical salaries in civil legal aid offices may choose manageable monthly payments and earn more than \$100,000 worth of loan forgiveness. These graduates then become free from student debt ten years after graduation. Here I set out the requirements for College Cost Reduction and Access Act public service loan forgiveness and explain the role of income-based repayment and the problem of high educational debt and low public service salaries. I also take up other federal debt-relief provisions applicable to civil legal aid lawyers.

Public Service Loan Forgiveness

The public service loan forgiveness program created by the College Cost Reduction and Access Act encourages individuals to enter and continue full-time public service employment. The program forgives the remaining balance of eligible direct loans after the debtors satisfy public service and loan repayment requirements.²

To qualify for loan forgiveness, a borrower must make monthly loan payments for ten years (120 payments) while working full-time in qualifying public service em-

¹College Cost Reduction and Access Act of 2007, Pub. L. No. 110-84, 121 Stat. 784, amending the Higher Education Act of 1965 (to be codified at 20 U.S.C. §§ 1001 *et seq.*). Final regulations are published in the *Federal Register*, 73 Fed. Reg. 63232 (Oct. 23, 2008) (to be codified at 34 C.F.R. pts. 674, 682, 685).

²121 Stat. at 800–801 (to be codified at 20 U.S.C. § 1087(e) (2007)); 73 Fed. Reg. at 63256 (2008) (to be codified at 34 C.F.R. § 685.219).

ployment; payments made before October 1, 2007, do not count toward the 120 required payments.³

In order to understand the scope of public service loan forgiveness, one must consider what employment qualifies, which loans are eligible, and which payments count toward the 120 required payments.

Qualifying Public Service Employment. What qualifies as public service employment is full-time paid work in

- the government;⁴
- a 501(c)(3) nonprofit entity;
- an AmeriCorps position;⁵
- the Peace Corps; or
- a private “public service organization.”

Most public interest lawyers work for 501(c)(3) nonprofit entities or the government. Employment in a 501(c)(3) nonprofit entity qualifies, and therefore both legal and nonlegal staff members who have significant debt and are employed by a civil legal aid organization may benefit from public service loan forgiveness.

Attorneys who do not work for a 501(c)(3) nonprofit entity or for the government may still qualify if they provide “public interest law services” for a “public service organization.”⁶ Public interest law refers to legal services provided by a “public service organization” funded at least in part by a local, state, federal, or tribal government and is not organized for profit, a labor union, a partisan political organization, or an organization engaged in religious activities.⁷

Definition of “Full-Time.” Final regulations define “full-time” as working in qualifying employment in one or more jobs for the greater of

- an annual average of at least thirty hours per week;
- an average of thirty hours per week for a contractual or employment period of at least eight months; or
- the number of hours the employer considers full-time unless the qualifying employment is with two or more employers.⁸

Part-time public service employees are ineligible for federal loan forgiveness.

Employers with policies defining “full-time” as more than an annual average of thirty hours per week may want to reconsider such policies since they may preclude some employees from benefiting from public service loan forgiveness.

Eligible Loans. Most students borrow federal student loans, such as Stafford loans and GradPLUS loans. Students borrow these federal student loans from one of two major federal student loan programs, the Federal Family Education Loan program or the federal Direct loan program. Federal student loans from the Federal Family Education Loan program are issued by private banks and lending institutions such as Sallie Mae but are still federal student loans. Direct loans are federal student loans issued directly by the U.S. Department of Education. Students do not choose whether they get their federal student loans from a Federal Family Education Loan lender or from Direct; schools participate in only one of these programs.⁹

³The borrower must be in qualifying employment when each of the 120 payments is made, when applying for forgiveness, and when forgiveness is granted (73 Fed. Reg. at 63256).

⁴Government employment may be work for local, state, federal, and tribal governments, government organizations, agencies, and entities but not service as a member of the U.S. Congress (*id.*).

⁵An AmeriCorps position means a position approved by the Corporation for National and Community Service under Section 123 of the National and Community Service Act of 1990 (42 U.S.C. § 12573 (2003)).

⁶*Id.*

⁷*Id.*

⁸Vacation or leave time provided by the employer or leave taken under the Family and Medical Leave Act is not considered in determining the average hours worked (*id.*).

⁹This information was adapted from Federal Student Aid, an office of the U.S. Department of Education, <http://studentaid.ed.gov/PORTALSWebApp/students/english/studentloans.jsp>.

When students graduate, many consolidate their federal student loans into a federal consolidation loan in order to reduce and extend the payments. Federal consolidation loans are available from Federal Family Education Loan lenders and from Direct, and students may choose either program.¹⁰ Only Direct loans (including Stafford loans, GradPLUS loans, and consolidation loans) are eligible for public service loan forgiveness.¹¹ Borrowers with Federal Family Education loans must consolidate these loans into federal Direct Consolidation loans in order to be eligible for public service loan forgiveness. Neither Parent PLUS loans nor Parent PLUS consolidation loans that repaid Parent PLUS loans are eligible for public service loan forgiveness. Borrowers are cautioned that consolidating Parent PLUS loans with loans eligible for public service loan forgiveness should be avoided.

Some students also borrow commercial loans from state or private lenders. Note that commercial loans are never eligible for public service loan forgiveness.¹² Students who went to school before 2006 are more likely to have a substantial amount of commercial student loan debt because a federal student loan, the GradPLUS loan, became available in 2006.

Borrowers who have already consolidated eligible federal student loans with a Federal Family Education Loan lender can reconsolidate into a federal Direct Consolidation loan. The provision of the

College Cost Reduction and Access Act creating this right to reconsolidate took effect July 1, 2008.

To find out what kind of student loans you have, request a personal identification number (PIN) from the U.S. Department of Education, www.pin.ed.gov; use the PIN to look up your loans in the National Student Loan Data System, www.nsls.ed.gov. Use www.annualcreditreport.com to check for commercial student loans, which do not appear in the National Student Loan Data System.

To get your eligible loans into the federal direct loan program by consolidating, you must consolidate all your Federal Family Education loans (and reconsolidate your Federal Family Education Consolidation loans) into Direct if you want those loans to be eligible for forgiveness. Use the online federal Direct Consolidation loan application available at the Education Department's website.¹³

Income-Based Repayment. The College Cost Reduction and Access Act created income-based repayment, a new plan in which annual student loan payments are capped at 15 percent of "discretionary income."¹⁴ "Discretionary income" is defined as the amount by which adjusted gross income (AGI) exceeds 150 percent of the federal poverty level.¹⁵

Income-based repayment has the potential to reduce substantially the amount of a borrower's monthly federal student loan payments. For most borrowers ex-

¹⁰Federal Family Education consolidation loans are less widely available today than they were in past years. For this reason, more recent graduates are likely to use federal Direct Consolidation loans.

¹¹Any outstanding loan made to a borrower under the Direct loan program is eligible for public service loan forgiveness except a defaulted loan, a Direct PLUS loan made to a parent borrower, or a Direct Consolidation loan that repaid a Federal Family Education loan or a Direct PLUS loan made to a parent borrower (§ 401, 121 Stat. at 800–801 (to be codified at 20 U.S.C. 1087e (2007))).

¹²Federal Perkins loans are eligible only if included as part of a federal Consolidation loan. Because borrowers may be eligible for cancellation of federal Perkins loans under a separate program, this should be thoroughly explored before consolidation (see Philip G. Schrag, *Federal Student Loan Repayment Assistance for Public Interest Lawyers and Other Employees of Governments and Nonprofit Organizations*, 36 HOFSTRA LAW REVIEW 27, 43 (2007); see also U.S. Department of Education, *Understanding Loan Consolidation: Is It the Right Move for You?*, www.ombudsman.ed.gov/consolidation.html).

¹³See <http://loanconsolidation.ed.gov>.

¹⁴§ 493C, 121 Stat. at 792–95; 73 Fed. Reg. at 63249, 63258.

¹⁵The government is authorized to pay unpaid interest for three years only for subsidized Stafford loans. The rest of the unpaid interest is capitalized. Income-based repayment has its own forgiveness provision, independent of public service loan forgiveness. A borrower may receive income-based repayment loan forgiveness after twenty-five years of qualifying payments without demonstrating the qualifying employment necessary for accelerated loan forgiveness for public service employment (see *supra* note 14).

cept the highest earners, income-based repayment loan payments are less than 10 percent of income. For example, a typical recent law graduate owing \$100,000 in federal student loans and earning \$40,000 would pay \$305 dollars per month under income-based repayment.¹⁶ If a borrower earns below 150 percent of the federal poverty level for the borrower's family size, the borrower's required loan payment is nothing. If a borrower earns more than 150 percent of the federal poverty level, the borrower's loan payment is capped at 15 percent of whatever the borrower earns above the 150 percent.

Income-based repayment becomes available on July 1, 2009, to all borrowers with a "partial financial hardship" (see table).¹⁷ A partial financial hardship occurs when the annual amount due on all of a borrower's eligible loans, as calculated under a standard ten-year repayment plan, exceeds 15 percent of "discretionary income."

Public service employees with a relatively high student-debt-to-income ratio readily qualify. A recent law graduate who has a typical student debt and is practicing as a civil legal aid attorney easily demonstrates a partial financial hardship. A simple rule of thumb is that borrowers who earn less than they owe in federal student loans demonstrate a partial financial hardship. For example, a borrower could earn \$100,000 a year and still qualify as long as the borrower owes at least \$107,664 in eligible student loans.

PARTIAL FINANCIAL HARDSHIP

Maximum Adjusted Gross Income (AGI) at Specific Debt Levels

Debt	AGI	Debt	AGI
\$25,000	\$38,616	\$65,000	\$75,444
\$30,000	\$43,219	\$70,000	\$80,044
\$35,000	\$47,822	\$75,000	\$84,648
\$40,000	\$52,425	\$80,000	\$89,251
\$45,000	\$57,028	\$85,000	\$93,854
\$50,000	\$61,632	\$90,000	\$98,457
\$55,000	\$66,235	\$95,000	\$103,061
\$60,000	\$70,838	\$100,000	\$107,664

Assumptions: Interest rate 6.8 percent; family size one; residing in forty-eight contiguous states; 2008 Poverty Guidelines, pursuant to 42 U.S.C. § 9902(2) (2003).

Source: Jeffrey E. Hanson, Ph.D., Director, Borrower Education Services, Access Group Inc.

IBRInfo.org has a simple online calculator to determine whether one qualifies for income-based repayment.¹⁸ Unlike most repayment plans, the amount of payments under income-based repayment is not determined by the amount of debt owed. One variable affecting monthly income-based repayment amounts is AGI.¹⁹ The other variable is the federal poverty guideline for the borrower's family size.²⁰

Use an online repayment calculator to estimate what your payments would be under income-based repayment. FinAid.org has a comprehensive income-based repayment calculator.²¹

¹⁶Assumptions: Interest rate 6.8 percent; family size one; residing in forty-eight contiguous states; 2008 Poverty Guidelines, pursuant to 42 U.S.C. § 9902(2) (2003).

¹⁷§ 493C, 121 Stat. at 792–95; 73 Fed. Reg. at 63249, 63258.

¹⁸See www.ibrinfo.org.

¹⁹Adjusted gross income (AGI) is that figure reported to the Internal Revenue Service and determined by reference to the borrower's tax return: income (wages, interest, capital gains, income from retirement accounts, alimony paid to the borrower) adjusted downward by specific deductions (including contributions to deductible retirement accounts, alimony paid by the borrower but not including standard and itemized deductions). AGI is the number written at the bottom of page 1 of the 1040 form and copied atop page 2.

²⁰Poverty guideline refers to the income categorized by state and family size in the poverty guidelines published annually by the U.S. Department of Health and Human Services pursuant to 42 U.S.C. § 9902(2) (2003). Family size is defined in the regulations as the borrower, the borrower's spouse, and the borrower's children (if the children receive more than half their support from the borrower) and others if they live with the borrower and receive more than half their support from the borrower (73 Fed. Reg. at 63249, 63258).

²¹See www.finaid.org/calculators.

If a borrower no longer has a partial financial hardship—because the borrower's income has increased, for example—the borrower may continue in the income-based repayment plan, but the lender recalculates the monthly payment due. The maximum monthly amount that the borrower may be required to repay is the amount that the borrower would have paid under the standard ten-year repayment plan had the borrower chosen the ten-year term when the borrower started repayment.

Married borrowers need to consider seriously whether to file joint or separate tax returns because, for a married borrower filing jointly, AGI includes both the borrower's *and* spouse's income. For a married borrower filing separately, AGI includes only the borrower's income. A married borrower must file a separate federal income tax return if the borrower wants to have the amount of the borrower's income-based repayment calculated solely on the basis of the borrower's student loan debt and AGI rather than on the combined income of the borrower and the spouse. Advocates are working to mitigate this requirement with a technical correction or amendment to the College Cost Reduction and Access Act.

Married persons filing separately have disadvantages, such as a higher tax rate and ineligibility for certain credits and deductions. Married borrowers must weigh the value of the immediate tax benefits against uncertain future income-based repayment and public service loan forgiveness benefits. More information for married borrowers facing this decision is available on the Equal Justice Works website.²²

Qualifying Payments. In order to qualify for public service loan forgiveness, borrowers must not choose an extended repayment plan as many have done in the past. Qualifying monthly payments include only those made on time as part of an income-contingent repayment plan;

an income-based repayment plan; a standard repayment plan based on a ten-year repayment schedule; or a repayment plan in which the monthly amount paid was not less than the monthly amount required under standard repayment over a ten-year repayment period.²³

Income-based repayment will be the preferred repayment plan for most borrowers who will ultimately earn public service loan forgiveness. Income-based repayment minimizes monthly loan payments and maximizes the amount ultimately forgiven if forgiveness is earned.

Because income-based repayment is not available until July 1, borrowers should consider choosing income-contingent repayment now and switch to income-based repayment in July.

Because some borrowers will at some point begin earning large enough salaries relative to their debt and no longer qualify for income-based repayment, qualifying payments include payments of the amount required under standard repayment over a ten-year repayment schedule. If a borrower chooses to leave income-based repayment or no longer qualifies, the borrower's required payments do not exceed the amount the borrower would have paid each month under a standard plan before the borrower chose income-based repayment. A few borrowers may choose to make payments of the amount required under the standard ten-year repayment for a portion of their time in public service employment if they are participating in a loan repayment assistance program (typically a law school-based program) that determines benefits according to monthly student loan payments.

An individual may take time off from eligible employment (e.g., to stay home with children), during which payments made would not count toward the 120 required payments. However, payments begin to count again when the individual returns to eligible employment.²⁴

²²See www.equaljusticeworks.org.

²³§ 493C, 121 Stat. at 792–95; 73 Fed. Reg. at 63249, 63258.

²⁴The College Cost Reduction and Access Act does not require that the 120 payments be continuous (Schrag, *supra* note 12).

Payments made under a fixed-term repayment plan with a term of more than ten years, or while not working in full-time qualifying public service employment, or on nonqualifying loans (e.g., Federal Family Education loans, commercial loans, Parent PLUS loans), or not within fifteen days of due date, or while borrower is in default do not count toward the 120-month requirement.

Documenting Eligibility for Public Service Loan Forgiveness. Borrowers apply for public service loan forgiveness after the close of the 120-payment qualifying period by using an application form that the Education Department is developing.²⁵ The Education Department anticipates that the form will include an employer certification section to be used annually to collect employer certification.²⁶ The form will include instructions on required supporting documentation.²⁷ The Education Department expects the borrower to collect and retain the records required to support the application for public service loan forgiveness.²⁸

Most borrowers working toward public service loan forgiveness will choose the income-based repayment plan. The income-based repayment plan requires borrowers to submit annual written consents and certifications.²⁹ Such consents are required for income verification so that the Education Department may verify the borrower's AGI as reported to the Internal Revenue Service (IRS).³⁰ If a borrower does not renew the required written consent each year, the lender treats the borrower as if the borrower no longer has a partial financial hardship,

and the lender recalculates the payment due.³¹ The borrower must annually certify family size. If the borrower does not recertify family size each year, the Education Department assumes a family size of one.³²

Borrowers are urged to comply diligently with the paperwork requirements of income-based repayment and public service loan forgiveness. Equal Justice Works will post detailed checklists of forms and documents required when the Education Department finalizes its procedures.

Tax Treatment of Public Service Loan Forgiveness. The U.S. Department of the Treasury confirms, in a September 19, 2008, letter to members of Congress, that public service loan forgiveness under the College Cost Reduction and Access Act meets the requirements of Internal Revenue Code Section 108(f) and is therefore not taxable income to the borrower.³³ Although as a general matter, income from the cancellation of indebtedness is taxable, Section 108(f) allows the forgiveness of certain student loans to be excluded from taxable income if the student loans are forgiven as a result of the borrower working for a certain period "in certain professions for any of a broad class of employers."³⁴ The Treasury Department indicates that student loans, including federal Direct Consolidation loans, forgiven pursuant to the College Cost Reduction and Access Act's public service loan forgiveness provision, meet the requirements of this section, and the forgiven amount is not subject to tax. Although this letter does not bind the IRS

²⁵73 Fed. Reg. at 63242.

²⁶*Id.* at 63241.

²⁷*Id.*

²⁸*Id.* at 63242.

²⁹*Id.* at 63251, 63258–59.

³⁰*Id.*

³¹*Id.*

³²*Id.* at 63251, 63259.

³³The U.S. Department of the Treasury's letter to Cong. Sander Levin (D-Mich.) and others is posted on the Equal Justice Works website, www.equaljusticeworks.org.

³⁴26 U.S.C. §§ 61(a)(12), 108(f)(1)–(2) (2000).

to this position, it is a good indication of its position on the issue.

New Programs in the Higher Education Act Reauthorization

The Higher Education Reauthorization and College Opportunity Act of 2008, which President Bush signed into law on August 14, establishes a program of loan repayment for civil legal assistance attorneys to encourage qualified individuals to enter and continue employment as civil legal assistance attorneys.³⁵ The Act establishes other new loan forgiveness and repayment programs that may benefit certain public interest lawyers.³⁶

The program of loan forgiveness for service in areas of national need authorizes the Education Department to provide up to \$2,000 per year for up to five years for those serving in specified “areas of national need”.³⁷ Among such areas are prosecution, public defense, and legal advocacy in low-income communities at a nonprofit organization.

The program of loan repayment for civil legal assistance attorneys authorizes the Education Department to provide up to \$6,000 per year in loan repayment assistance to eligible full-time civil legal assistance attorneys.³⁸ The program is designed as follows: the Education Department is to make direct payments to the lender and issue a new, forgivable loan to the attorney in exchange for a three-year service commitment. The schedule of loan forgiveness will be clarified through regulations, expected by November 1, 2009. An attorney may renew service commitment and receive benefits up to maximum of \$40,000.

Federal student loans (both Federal Family Education loans and Direct loans) are eligible for assistance; however, Parent

PLUS loans and commercial and alternative loans are not eligible.

Attorneys who have practiced law for five years or less and have served as a civil legal assistance attorneys for 90 percent of that time are given priority in the disbursement of repayment benefits. Those who were awarded funds under the loan repayment for civil legal assistance attorney program during the preceding year and have completed less than three years of the first required period of service are given priority.

The Higher Education Reauthorization and College Opportunity Act authorized the appropriation of \$10 million for the loan repayment for civil legal assistance attorneys program for the 2009 fiscal year and such sums as necessary for the five succeeding fiscal years. Funds are unlikely to be appropriated for the 2009 fiscal year, and appropriations are not expected before October 2009. Even if the program is eventually fully funded, the funds are unlikely to be sufficient to cover all eligible attorneys. For this reason, expect that not all eligible civil legal assistance attorneys will receive assistance under this program. Similarly the loan forgiveness for service in areas of national need program is unfunded.

The Education Department will issue regulations detailing the administration of these programs by November 1, 2009. Attorneys who receive assistance under the loan repayment for civil legal assistance attorneys program probably may not count payments made during the three years of their service commitment toward public service loan forgiveness under the College Cost Reduction and Access Act. Similarly payments made while receiving benefits under the loan forgiveness for service in areas of national need program may not count

³⁵Higher Education Reauthorization and College Opportunity Act of 2008, Pub. L. No. 110-315, §§ 430-431, 952, 122 Stat. 3078.

³⁶The John R. Justice Prosecutors and Defenders Incentive Act provides \$10,000 per year in exchange for a onetime renewable three-year commitment for state and local prosecutors and public defenders and certain federal public defenders; the Perkins loan cancellation for public service provides a partial loan cancellation for persons in specified public service jobs such as federal public defenders (Higher Education Reauthorization and College Opportunity Act § 952).

³⁷*Id.* § 430.

³⁸*Id.* § 431.

toward public service loan forgiveness. A person likely may receive benefits from only one of the Higher Education Reauthorization and College Opportunity Act programs at a time. Advocates are working to clarify and perhaps amend this provision of the Act.

Public Service Lawyers' Need for Strong Loan Repayment Assistance Programs

Public interest scholarships, loan repayment assistance programs, fellowships, and other public service financial programs for lawyers entering public service continue to serve a vital function, and funding for such programs must remain a priority. Although the new income-based repayment plan and public service loan forgiveness will help many career public service lawyers, they do not solve the problem of high student debt and low public service salaries. Some attorneys will be unable or unwilling to make a ten-year commitment to public service because of parenthood, a spouse's job movement, other family commitments, or not knowing if the career is for them. Public service loan forgiveness does not assist those who do not complete a full ten years of public service employment.

Not all loans are eligible for public service loan forgiveness, and experienced attorneys benefit the least. The requirements for public service loan forgiveness show why the need continues for other loan repayment assistance programs, such as law-school, employer-sponsored, and state-based programs. Newer attorneys stand to benefit to a much greater degree than more experienced lawyers because they tend to have higher amounts of eligible debt and because they tend to have lower amounts of ineligible debt. Remember that only federal Direct loans are eligible for public service loan forgiveness and that borrowers with Federal

Family Education loans can and must consolidate their Federal Family Education loans into federal Direct to take advantage of public service loan forgiveness.³⁹ By being consolidated into federal Direct, federal student loans such as Stafford loans and GradPLUS loans are eligible for forgiveness, but many borrowers, particularly those who borrowed before 2006, also have commercial or alternative student loans from state or private lenders. These commercial loans are never eligible for public service loan forgiveness.⁴⁰ Because GradPLUS loans were not available until 2006, graduates borrowing before 2006 had limited access to the loans that are now eligible for public service loan forgiveness, and such graduates had to borrow substantial amounts from ineligible commercial loans.⁴¹ Those graduating before 2006 typically have about half their debt in ineligible commercial loans. Current law students who take advantage of the now available GradPLUS loans may have almost exclusively eligible debt.⁴²

Public service loan forgiveness will benefit only those who still owe money on eligible loans after ten years of qualifying payments are made after October 1, 2007.⁴³ Public service loan forgiveness does not give credit for time in public service or payments made before October 1, 2007. An attorney who graduated in 1997 and has been making payments since graduation may not have any eligible debt remaining after making another ten years of payments. Compounding the problem for experienced attorneys is that they will remain responsible for their ineligible debt.

Part-time attorneys are ineligible for public service loan forgiveness. Full-time employment—an average of thirty hours per week or the employer's hours' requirement if higher—is required for eligibility. An increasing number of pub-

³⁹See § 401, 121 Stat. at 800–801.

⁴⁰*Id.*

⁴¹Higher Education Reconciliation Act of 2005, Pub. L. No. 109-171, 120 Stat. 155 (2008).

⁴²See Schrag, *supra* note 12 at 32.

⁴³See § 401, 121 Stat. at 800–801; 73 Fed. Reg. at 63256.

lic interest attorneys, particularly working mothers, are working less than full-time and are ineligible for public service loan forgiveness.

Not all eligible attorneys will serve for the full ten years required to receive forgiveness. As noted earlier, some attorneys are unable or unwilling to make a ten-year commitment to public service for varied reasons—parenthood, a spouse’s job movement, and factors beyond the attorney’s control. Public service loan forgiveness does not help those who serve less than the full ten years.



Despite the laudable enactment of the College Cost Reduction and Access Act,

traditional loan repayment assistance programs continue to be critical for many public service attorneys. Law-school, state-based, and employer loan repayment assistance programs help make public service work a viable choice for attorneys with commercial student loans, for part-time attorneys, and for attorneys serving for less than ten years. The College Cost Reduction and Access Act public service loan forgiveness and income-based repayment in conjunction with well-funded, carefully designed loan repayment assistance programs can change the future of public interest law by making it possible for those who contend with huge educational debt to choose public service.

COMMENTS?

Fill out the comment form at <http://tinyurl.com/Jan-FebCRSurvey>. Thank you.

—The Editors

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