



UNITED STATES DEPARTMENT OF EDUCATION

February 18, 2020

American Bar Association  
Attn: James Dimos, Deputy Executive Director & General Counsel  
321 North Clark Street  
Chicago, IL 60654

Re: Public Service Loan Forgiveness

Dear Mr. Dimos:

I am writing to affirm that the U.S. Department of Education will consider an individual who has loans outstanding under the William D. Ford Federal Direct Loan (Direct Loan) Program and who works full-time for the American Bar Association (ABA) under IRS Employer Identification Number (EIN) 36-0723150 to be “employed in a public service job” within the meaning of 20 U.S.C. § 1087e(m)(1)(B), and to be “employed full-time by a public service organization,” within the meaning of 34 C.F.R. § 685.219(c)(1)(ii), for purposes of qualifying for loan forgiveness under the Public Service Loan Forgiveness (PSLF) Program. This means that any Direct Loan borrower who works full-time for the ABA under that EIN is considered to have satisfied the public service employment criterion for PSLF for the months in which that employee worked for the ABA under that EIN.

The decision reflected in this letter is based on the information currently available to the Department, and the Department cannot provide any assurances about the ABA’s future qualification as a public service organization should the ABA’s relevant circumstances change in the future. For example, the ABA would not qualify in the future if it became a business organized for profit or no longer provided a public service as defined in the definition of “Public service organization” in 34 C.F.R. §685.219(b). In addition, this decision does not restrict the Department from issuing valid regulations that may change the definition of a “public service organization” or otherwise change the applicable regulations in a way that is relevant to the ABA, one of its constituent parts, or any other employer. Finally, the fact that an applicant’s employer qualifies as a “public service organization” does not relieve the applicant of any other statutory or regulatory requirement that applies to the PSLF Program.

Sincerely,

Ian Foss  
Program Specialist  
Federal Student Aid