

July 20, 2024

Mr. Greg Marak
U.S. Department of Education
400 Maryland Avenue SW
Washington DC 20202-4260

Dear Mr. Greg Marak:

UnidosUS would like to thank you for the opportunity to comment on the request for information on Identifying and Tracking Data Related to Early Childhood Education (ECE) Providers for the purpose of Public Service Loan Forgiveness (PSLF). We appreciate the Department's commitment to helping alleviate the financial burden of postsecondary education felt by those who have chosen to work and serve in their communities.

UnidosUS is a nonprofit, nonpartisan organization that serves as the nation's largest Hispanic civil rights and advocacy organization. Since 1968, we have challenged the social, economic, and political barriers that affect Latinos through our unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico, 50 of whom are child care providers.

We strongly support expanding the eligibility of PSLF to all ECE providers regardless of their employer's tax status. This is crucial for the ECE workforce, and will highly impact Latinas, as they make up a little over a fifth of childcare workers.* This workforce is also chronically underpaid and would greatly benefit from debt relief. ECE workers earn a median of \$11.65 per hour, and Latina child care workers earn even less with a median hourly wage of \$10.87.† This causes a high turnover in the ECE workers that makes it difficult for programs to hire and retain their staff.

It is especially hard to recruit and retain bilingual and bicultural ECE educators which creates a challenge for Latino parents as over 90% of them prioritize multilingual and multicultural ECE when selecting care.‡ Latina educators play a critical role in providing culturally and linguistically responsive care. Many of these Latino early educators work in home-based and for-profit settings that are currently ineligible for PSLF. Expanding eligibility would promote equity and diversity in the ECE field. This would also improve access to high-quality, culturally and linguistically responsive ECE programs that can serve dual language learners (DLLs). More than one in four babies born in the U.S. is Latino and one in three are dual language learners.§ Without a strong base of child care workers, particularly those who reflect the cultural and linguistic diversity of our country, families will continue to be directly affected.

* National Women Law Center (2023), The Child Care and Early Learning Workforce Is Underpaid and Women are Paying the Price, <https://nwlc.org/wp-content/uploads/2023/05/child-care-workers-5.25.23v3.pdf>

† Center for the Study of Child Care Employment (2020), The Early Childhood Educator Workforce, <https://cscce.berkeley.edu/workforce-index-2020/the-early-educator-workforce/early-educator-pay-economic-insecurity-across-the-states/>

‡ Abriendo Puertas/Opening Doors (AP/OD) and UnidosUS, National Latino Family Report (2024), <https://unidosus.org/publications/national-latino-family-report-2024/>

§ Early Edge California, UnidosUS and Children's Equity Project (2024), Immediate Actions the Biden Administration Can Take for Dual Language Learners, <https://unidosus.org/publications/immediate-actions-the-biden-administration-can-take-for-dual-language-learners/>

To refine the implementation of the expansion of PSLF to ECE educators, we encourage ongoing stakeholder engagement, particularly with Latino-serving ECE organizations. This stakeholder engagement is critical to ensure that ECE workers and their employees understand how any prospective PSLF eligibility would work. It is also crucial to consider the need for Spanish-language resources and outreach to ensure Latino educators can access PSLF once eligible, in line with the Department's commitment to diversity, equity, and inclusion. With the high proportion of the ECE workforce made up of Latina workers, communication about how PSLF will work and how to apply is critical to having the maximum benefit for the ECE workforce.

Our Affiliate Network, which includes nearly 300 community-based organizations across the United States and Puerto Rico, has provided valuable feedback on extending PSLF eligibility to early childhood educators working in for-profit settings. Based on responses from a sample of our affiliates, there is support for using licensure numbers as the primary identifier for eligible employers, rather than relying solely on EINs. This approach would be more inclusive, including home-based providers who may use Social Security numbers instead of EINs. Additionally, we urge the Department to consider state-specific programs. For example, California's registry TrustLine offers a potential model for including friends, family, and neighbor caregivers who are crucial for many Latino families. Similar programs in other states could provide additional avenues for identifying eligible ECE providers. Affiliates suggest that state licensing entities, responsible for overseeing both non-profit and private early childhood education centers, could be valuable partners in this process.

Regarding the Department's questions about data collection and privacy considerations, our responding affiliates believe that state and tribal agencies overseeing ECE programs are generally well-positioned to collect and provide this information, though the process may vary by state. We recommend that the Department work closely with these agencies to establish a streamlined, privacy-compliant process for collecting and verifying licensure information and exploring state-specific programs, which could potentially be more efficient and comprehensive than relying on EINs alone.

To further explore this critical issue and gather more comprehensive feedback from our network, UnidosUS would be pleased to organize a listening session with our affiliates on the topic of PSLF eligibility for ECE providers. This session would allow for a broader range of perspectives from our diverse network of community-based organizations, providing the Department with valuable insights from those working directly in the field. We believe this collaborative approach would greatly contribute to the development of an equitable and effective PSLF policy for ECE providers. Please let us know if you would be interested in participating in such a session, and we would be happy to arrange it at your convenience.

Thank you for considering our views on this important matter.

Sincerely,

Tania Villarroel
Policy Advisor, Early Childhood Education
UnidosUS