



Lynanne Gutierrez

President & CEO, Groundwork Ohio
 lgutierrez@groundworkohio.org
 mobile: 614-204-6106
 175 S. 3rd Street., Suite 420
 Columbus, Ohio 43215

May 5, 2025

U.S. Department of Education
 400 Maryland Avenue, SW
 Washington, D.C. 20202

Re: Negotiated Rulemaking for the Higher Education Act: Public Service Loan Forgiveness (Document Number: 2025-05825; Docket ID: ED-2025-OPE-0016)

To Whom It May Concern:

Groundwork Ohio appreciates the opportunity to comment on the Department of Education's intent to negotiate regulations refining definitions of a qualifying employer for the Public Service Loan Forgiveness (PSLF) program.

Groundwork focuses on ensuring that every pregnant mother, baby, toddler, and young child in Ohio has the resources and opportunities for a strong start. Our statewide policy and advocacy efforts aim to support young children during the critical prenatal period through age five. By aligning strategies with diverse stakeholders, we work to establish equitable policies that help every young child reach their full potential.

Importance of Early Childhood Educators

The importance of high-quality early childhood education cannot be overstated. During the early years, children's experiences and environments profoundly influence their health, development, and life trajectory. Early childhood educators play a crucial role in providing these foundational experiences.

Early childhood educators in Ohio provide indispensable public service by fostering the early learning and developmental growth essential to children's lifelong success. Despite their crucial role in society, these educators continue to face considerable economic hardships, with an average annual salary of approximately \$23,234¹. However, the average cost of attendance for a student living on campus at an in-state public four-year institution is \$27,146

¹ Center for the Study of Child Care Employment. (2024). *Early Childhood Workforce Index 2024: Executive summary - Key findings*. University of California, Berkeley.
<https://cscce.berkeley.edu/workforce-index-2024/executive-summary/key-findings/>

per year, totaling \$108,584 over four years². These financial realities make it nearly impossible for early childhood educators to increase their skills and repay their student loans, despite the critical nature of their work.

Workforce Crisis and Economic Impact

Unfortunately, due to inadequate wages, 23% of Ohio's early childhood educators rely on public benefits to meet their basic needs³. The financial strain placed upon these educators has contributed to one in five early educators leaving the field between 2023-2024 alone⁴. The child care sector is in crisis, significantly impacting families, employers, and the broader economy.

Currently, 58% of Ohio's child care providers report staffing shortages that directly limit available child care slots⁵. 51% of providers have raised tuition fees to maintain business operations, exacerbating the affordability issue⁶. Consequently, 39% of all Ohioans—and notably, 60% of rural Ohioans—live in child care deserts, with few or no licensed child care providers accessible⁷.

A recent poll⁸ commissioned by Groundwork Ohio shows that:

- 49% of parents with children under five struggle to find suitable child care;
- 51% report worsening availability of high-quality, affordable child care;
- and 73% indicate child care is too expensive.

Expanding PSLF Eligibility for Early Childhood Educators

Quality early childhood education requires qualified and well-trained educators. However, the ECE landscape comprises for-profit, non-profit, private, and public entities. Educators often move between these sectors along with out of the sector entirely, all in search of better financial opportunities. They should not be penalized for seeking employment that offers greater financial security. It is imperative that all early childhood educators, regardless of their employer's tax status, have access to PSLF. This will help retain a qualified workforce dedicated to nurturing our youngest learners.

² Hanson, Melanie. "Average Cost of College & Tuition" EducationData.org, March 8, 2025, <https://educationdata.org/average-cost-of-college>

³ Center for the Study of Child Care Employment. (2024). *Early childhood workforce index 2024: Appendix 2*. University of California, Berkeley. <https://cscce.berkeley.edu/workforce-index-2024/wp-content/uploads/sites/4/2024/10/2024-Early-Childhood-Workforce-Index-Appendix-2.pdf>

⁴ Workforce and Program Analysis Platform. (2024). State fiscal year 2024 summary: July 1, 2023 – June 30, 2024. Ohio Professional Registry and Ohio Child Care Resource and Referral Agency. [Workforce and Program Analysis Platform. \(2024\). State fiscal year 2024 summary: July 1, 2023 – June 30, 2024. Ohio Professional Registry and Ohio Child Care Resource and Referral Agency. https://d2hfgw7vtz2tl.cloudfront.net/wp-content/uploads/2024/07/WPAP-SFY-2024-Summary-07-29-2024.pdf](https://d2hfgw7vtz2tl.cloudfront.net/wp-content/uploads/2024/07/WPAP-SFY-2024-Summary-07-29-2024.pdf)

⁵ National Association for the Education of Young Children. (2024). *State survey data briefs 2024*. <https://www.naeyc.org/state-survey-briefs-2024>

⁶ Ibid.

⁷ Center for American Progress, Child Care Deserts (2020)

⁸ Ground Work Ohio Child Care Poll (2024) <https://www.groundworkohio.org/poll>

We strongly recommend that the Department broaden the qualifying employer definition under the PSLF program to explicitly include all licensed and regulated early childhood education providers, irrespective of their profit or tax-exempt status. Current PSLF criteria unjustly exclude numerous early childhood educators solely because their employers operate as for-profit entities, despite their equivalent contribution to the public good. Expanding PSLF eligibility would acknowledge the inherent public service provided by all educators and enhance workforce stability.

The Early Childhood Education (ECE) workforce is among the lowest paid occupations in the country, despite the critical nature of their work. Expanding PSLF to include for-profit ECE employees would support a workforce that is essential to our nation's future.

Refining the PSLF qualifying employer definition to encompass all licensed early childhood education providers would yield significant benefits, stabilizing an essential workforce that profoundly impacts the educational and economic wellbeing of Ohio's children and families. This expansion would represent a meaningful step toward addressing workforce shortages, improving retention rates, and ensuring consistent, quality early education services statewide.

Groundwork Ohio supports the expansion of PSLF to include Early Childhood Educators to receive this support. Thank you for considering our comments and for your ongoing commitment to improving the lives of early childhood educators and the children they serve.

Sincerely,

A handwritten signature in black ink, reading "Lynanne Gutierrez". The signature is written in a cursive, flowing style.

Lynanne Gutierrez
President & CEO
Groundwork Ohio