OMB Comments On Federal Direct PLUS Loan Application and Master Promissory Note, and Endorser Addendum (1845-0068)

1. The short statement in ROCIS on burden states that "There is no decrease in hours although ROCIS is reporting a decrease." Please explain.

ED RESPONSE: When RIMS separated this collection into more than the one migrated IC, it resulted in ROCIS identifying a decrease since hours were pulled out of the overall burden and separated into split-out ICs. Even though ROCIS identified the first IC (the modified IC) as a decrease, there actually was no decrease at all. Again, the hours were just moved out of the migrated portion and moved appropriately to the other IC.

2. Did ED receive any public comment on this collection?

ED RESPONSE: We received no public comments on this collection.

3. The previous terms of clearance requires ED to substantially revise the form, taking into account comments from NCHELP and changes resulting from HERA when HEA is reauthorized. How has ED taken into account comments from NCHELP?

ED RESPONSE: NCHELP's comments have related to the FFEL PLUS Loan MPN, and as such they do not always apply to the Direct PLUS Loan MPN. The two MPNs are similar, but they have a number of differences that reflect differences in the two loan programs. However, we incorporated some of NCHELP's previous recommendations when developing the initial drafts of the Direct PLUS Loan MPN documents, and we have also made a few additional changes to the final drafts based on the comments that NCHELP submitted on the FFEL PLUS Loan MPN during the 30-day comment period for that collection.

4. (Last bullet in Question 1 of the supporting statement) How has the new identity theft discharge provision impacted this collection?

ED RESPONSE: The only impact on this collection is that we have had to add language covering the new loan discharge provision to Item 21 (Discharge – having your loan forgiven) of the Borrower's Rights and Responsibilities Statement.