

**OMB Comments On
Federal PLUS Loan Application and Master Promissory Note, Endorser Addendum, and
School Certification (1845-0069)**

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 ICs.

2. How have the new identity theft loan discharge provisions impacted this collection?

ED RESPONSE: The only impact on this collection is that we have had to add language covering the new identify theft loan discharge provision to Item 14 (Loan Discharge) of the Borrower's Rights and Responsibilities Statement.

3. The previous terms of clearance requires ED to substantially revise the form, taking into account comments from NCHELP and TG, and changes resulting from HERA when HEA is reauthorized. NCHELP has filed substantial comments on this form (please see other attachment). OMB would like to discuss these comments with ED.

ED RESPONSE: The revised forms reflect previous comments received from NCHELP and TG, as well as the changes required by the HERA. In addition, we have made almost all of the changes recommended by NCHELP in the comments that were submitted during the 30-day public comment period. NCHELP's comments, with ED's responses, are included with this submission.