

ICR Number 1845-0011 – Deferment Requests (Master) for the William D. Ford Federal Direct Loans and Federal Family Education Loan Programs
(60D) Comment Response Table

Comment #	Commenter Name	Comment	FSA Response	Change to ICR or Form
004	Robert McIntosh	The department should phase out economic hardship, military deployment and unemployment deferments because all of these situations can be addressed through an income driven repayment plan. Allowing both is redundant and unnecessary. If someone's income is low due to any of these situations, their payments would also be low or zero, which serves the same purpose. Additionally, while on deployment in a combat zone, typically military pay is HIGHER, not lower, which is not a reason to defer a loan.	The economic hardship, military deployment, and unemployment deferments are statutory and must be made available to borrowers.	No change
006	Anonymous	Segregate the schools now. Race plays a factor in when school shootings are likely to occur. At predominately black schools, students are more likely to experience a shooting after 4 p.m., typically during an after-school event. And while black students make up about 15% of the more than 50 million students in the US, they account for about a third of the students who experienced a school shooting since 2009.	No Response	Out of scope
005	NCHER and SLSA	These forms appear to be unformatted versions, and our concerns may be addressed once the pdf versions are created; however, we would like to request the borrower Name and SSN fields be included in any subsequent page the borrower/official (as applicable)	As part of an effort to make our forms more consistent and to facilitate the process of making them 508-compliant, all forms will be re-formatted following OMB approval. The reformatted forms will include name and SSN fields on all pages required to be submitted. Comments on individual forms regarding fonts,	No change

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		has to complete, like the current existing collection. This ensures all the pages can be identified for the correct account.	page breaks, and line separations will not be specifically addressed, as these matters will be addressed as part of the re-formatting process.	
		To be consistent with the forbearance forms, and to be used as a curing instrument, we strongly recommend that the “agree to repay” language should be added to all of these deferment request forms. E.g. “I will repay my loans according to the terms of my promissory note, even if my request is not granted.”	This language was added to the forbearance forms to implement the regulations at 34 CFR 685.205(a)(8) and 34 CFR 682.211(d), which permit ED or FFEL lenders to grant forbearance to a borrower who is in default. Under those regulations, the terms of the forbearance agreement “must include a new agreement to repay the debt signed by the borrower or endorser or a written or oral affirmation of the borrower’s or endorser’s obligation to repay the debt.” Because borrowers in default are not eligible for deferments, we do not believe the same language is needed on the deferment forms.	No change
		All the deferment forms (except the Cancer Treatment) include a definition of deferment and within it, it says that a lender may capitalize interest quarterly – see below. That is only true for very old loans and is not accurate for loans first disbursed on or after 7/1/2000 when quarterly capping was eliminated. We understand that the “may” is probably there to cover those very old loans where it is permissible, but since it’s not applicable to the overwhelming majority of today’s FFELP borrowers it can be misleading. It may be that it is time to	Thank you, we agree that this clarification is an improvement to the form. It has been updated in the revised versions of each form in both the definition of Deferment and forbearance. Additionally, to further acknowledge the rarity of quarterly capitalization, we have removed it as an example of the effects of capitalization in the capitalization chart on each form.	changed

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		<p>remove it, or at a minimum, clarify it.</p> <p>A deferment is a period during which you are entitled to postpone repayment of your loans. Interest is not charged to you during a deferment on your subsidized loans. Interest is always charged to you during a deferment on your unsubsidized loans. Unpaid interest that accrues during a deferment on an unsubsidized Direct Loan or on an unsubsidized FFEL Program loan that is held by the Department is capitalized at the end of the deferment period. Unpaid interest that accrues during a deferment on a FFEL Program loan that is not held by the Department may be capitalized quarterly or at the end of the deferment period.</p> <p>If the Department decides to clarify it, we suggest the sentence be revised to read: "Unpaid interest that accrues during a deferment on a FFEL Program loan that is not held by the Department is capitalized at the end of the deferment but may be capitalized as frequently as quarterly on loans disbursed prior to 7/1/2000."</p>		
	NCHER and SLSA Form Specific comments			
		A1 CTD		
		<p>S2 General:</p> <p>This form doesn't have a section for the</p>	<p>Thank you, we agree that this clarification is an improvement to the form. The form has been updated to include a section that describes a</p>	<p>changed</p>

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		borrower to determine if they are “eligible” as is found on other deferment forms. We suggest some type of language or pre-screening that will allow the borrower to determine eligibility. Perhaps a section similar to Section 2 on the Parent PLUS Borrower Deferment Request.	borrower’s eligibility.	
		S4 RE: “If you have loans that were made jointly to you and your spouse (as co-makers),...”: There currently is not a definition for “co-maker”, and we believe it should be added, “A co-maker is one of the two individuals who are joint borrowers on a Direct or Federal Consolidation Loan or a Federal PLUS Loan. Both co-makers are responsible for repaying the full amount of the loan.”	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		S5 Definition of Capitalization The Capitalization definition on this form should be updated to match the other deferment forms, [language copied]	Thank you for identifying this inconsistency. The definition of Capitalization has been updated in the revised version of the form, however, when the Capitalization Chart is referenced, it differs because the example provided in the chart is for a FFEL loan in forbearance since most loans would not accrue interest to be capitalized during a Cancer Treatment Deferment.	changed
		S7 PRA Statement RE: “please contact your loan holder directly (see Section 7).”: This should reference Section 6.	Thank you for identifying this inconsistency. We have updated our forms to remove this internal reference to provide more consistency between forms.	changed

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		A2 HRD		
		S2 Item 2 RE: “Supplemental Security Income (551)”: We believe this is intended to state “SSI” and not “551”.	Thank you for identifying this typo. It has been corrected in the revised version of the form.	changed
		S2 Item 2 RE: “means-tested benefits”: We believe what this (“means-tested benefits”) covers should be defined on the form. Is it only federal or state benefits? Are county benefits also included since many of those benefits are also means-tested?	We believe it is unnecessary to further define “other means-tested benefits”. The sentence, when read as a whole, covers federal and state benefits and the “other” category captures such benefit programs not specified.	No change
		S5 Table 2: Regarding the poverty guideline chart on the Economic Hardship Form, the chart rounds everything to whole dollars, where previously it listed the cents (.25, .50, or .75) on all the numbers. This is not a big difference, but it is a change in direction and there is always the chance it could be the difference between approved/denied. When the forms are updated each year, they have always included the cents as well. For consistency and clarity, we recommend the cents be added back to the chart.	The update to the Poverty Guidelines table was not intended to convey a change in direction. As such, the table has been updated in the revised version of the form.	changed
		A3 GFL		
		S4 RE: “Note: Instead of having an authorized official complete this section,...”:	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed

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		We recommend this language be updated for consistency with other certified deferment forms, “Note: As an alternative to having an authorized official complete this section...”		
		A4 SCH		
		S2: RE: eligibility: While it is more of an exception than a norm, this language doesn’t consider older borrowers (those with loans disbursed prior to 7/1/87) are not eligible for deferment based on halftime enrollment.	This language was previously determined to be no longer relevant on the In School Deferment Request. We believe this continues to be unnecessary.	No change
		S3 Understandings bullet 3: We suggest updating this bullet to mimic the update made to the bullet above: “My deferment will end on the date I no longer qualify for the deferment, as certified by the authorized official.”	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		S4 RE: “Note: As an alternative to completing this section,”: We recommend this language be updated for consistency with other certified deferment forms, “Note: As an alternative to having an authorized official complete this section...”	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		S4 Bullets 3 & 4 RE: “The academic period for which I am certifying...” (X2):	Thank you, we agree that this clarification is an improvement to the form. It has been updated in the revised version of the form.	changed

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		We suggest rewording this to state “enrollment period”, as schools may not provide the full enrollment based on how this is currently written and may be more likely to send shorter periods of enrollment.		
		S5: RE: “If you have loans that were made jointly to you and your spouse (as co-makers)...”: We recommend to change “your” to “a”, as the borrower may no longer be with the original spouse or may have since gotten remarried who is not a comaker	At the time the loan was made, it was to the borrower and their current spouse at the time, so the use of “your” in that instance is appropriate.	No change
		A5 MIL		
		S3 Section Heading: RE: “SECTION 3: BORROWER CERTIFICATIONS AND AUTHORIZATION”: This should be changed to “Borrower Understandings, Certifications, and Authorization.”	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		S3 Bullet 2: RE: “...or the date I indicated in Section 2 in the case of a Post-Active Duty Student Deferment.”: Section 2 provides a space for the borrower to select a later begin date for the Military Service Deferment, but not for the Post- Active Duty Student Deferment.		
		S3 “I authorize”	Thank you for identifying this inconsistency. It has	changed

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		<p>RE: "...my request or my loan(s) at any cellular telephone...":</p> <p>Other forms show this as "loans". We suggest updating this for consistency.</p>	<p>been corrected in the revised version of the form.</p>	
		<p>S4 Item 2: RE: "Skip to the paragraph after item 3.":</p> <p>We are not sure what this means. There is no paragraph after item 3. We believe this should be "Item 4".</p>	<p>Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.</p>	<p>changed</p>
		<p>S6: RE: Definition of "forbearance":</p> <p>The language varies here from the other deferment forms [RE: first sentence]. We suggest updating this to match the other forms. "a forbearance is a period during which you are permitted to postpone making payments temporarily, allowed an extension of time for making payments, or temporarily allowed to make smaller payments than scheduled."</p>	<p>Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.</p>	<p>changed</p>
		<p>S6: Definition of "forbearance" RE: "Interest continues to accrue during forbearance and will capitalize at the conclusion of the forbearance period if not paid.":</p> <p>(1) We don't feel this statement is necessary due to the next sentence also stating interest is charged. (2) We would suggest this part of the sentence be removed, as this isn't the case</p>	<p>Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.</p>	<p>changed</p>

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		for Direct and Department-held FFELP. The next few sentences clarify what happens with the interest.		
		S7 Terms and Conditions RE: “Interest will not accrue on your Perkins Loan Program loan(s) or on your subsidized Direct Loan or FFEL Program loan(s) during your deferment.”: We would change this to an “and” for consistency with the rest of the paragraph.	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		S9 PRA statement RE: “The valid OMB control number for this information collection is 1845-0080 ” This would need updated to 1845-0011 to conform to the combined collection proposed.	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		A6 PLUS		
		S3 Bullet 1 RE: “SSN”: Just to be completely transparent, we suggest this state, “Student’s SSN”.	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		A7 RHT		
		S4 RE: “Borrower: Instead of having an authorized official complete this section...”: We recommend this language be updated for consistency with other certified deferment forms, “Note: As an alternative to having an authorized official complete	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed

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		this section..."		
		A8 UNEM		
		<p>S2 RE: "For most borrowers, maximum eligibility is 36 months." We believe this should say, "maximum cumulative eligibility is 36 months per loan program."</p>	<p>Thank you, we agree that this clarification is an improvement to the form. It has been updated in the revised version of the form.</p>	<p>changed</p>