

ICR Number 1845-0018 – Forbearance 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	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) has to complete, like the current existing collection. This ensures all the pages can be identified for the correct account.	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, page breaks, and line separations will not be specifically addressed, as these matters will be addressed as part of the re-formatting process.	No change
		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	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	changed

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		<p>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 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 <b>may</b> 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>	<p>capitalization chart on each form.</p>	
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	NCHER and SLSA Form Specific comments			
		A1 GEN		
		<p>S3 Bullets            RE: Bullet 2 “Interest may capitalize on my FFEL Program loans that are not held by the Department during or at the expiration of my forbearance, but interest never capitalizes on Perkins Loans.”</p> <p>The current version of this form includes the following additional text with this bullet point: “Interest capitalization usually increases the amount of interest I will pay, and may increase my monthly payment.” Although this isn’t really critical to the request, and is generally covered in the definition of Capitalization provided below (which is mostly the same in all relevant ways as in the current version of the form).</p>	As part of our goal to be more consistent in our forms, we removed this language from Section 3 since the explanation of the effect of interest capitalization is already provided in the definitions and chart in Section 6.	No change
		<p>S3 Bullets            RE: Bullet omitted</p> <p>For consistency with other forms, the following bullet should be added: “My loan holder may grant me an additional forbearance while processing my form or to cover any period of delinquency that exists when I submit my form.”</p>	Thank you for identifying this omission. It has been corrected in the revised version of the form.	changed
		<p>S3            RE: Bullet 6 “Any payment I make during forbearance will not count towards</p>	Thank you for making this suggestion. We agree that this statement is deserving of its own bullet. It has been corrected in the revised version of the	changed

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		<p>forgiveness under income-driven repayment plans or Public Service Loan Forgiveness.”</p> <p>We believe this should be its own separate bullet.</p>	form.	
		<p>S3 Borrower’s Signature          RE: Omission of endorser signature</p> <p>On the current version, endorser was included with the “Borrower” on the signature line to obtain their signature as well. This should be retained and added back in.</p>	Thank you for identifying this omission. It has been corrected in the revised version of the form.	changed
		A2 SERV		
		<p>S2 Item 1          RE: “Have you been accepted into an internship/residency?”</p> <p>We suggest adding the word “program” here as this is how it is referred to in succeeding questions. To read: “Have you been accepted into an internship/residency program?”</p>	Thank you for making this suggestion. We agree that this is an improvement to the form. It has been updated in the revised version of the form.	changed
		<p>S4          RE: “Note: Instead of having an authorized official complete this section,”</p> <p>We recommend this language be updated for consistency with the certified deferment forms, “Note: As an alternative to having an authorized official complete this section...”</p>	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed

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		A3 SLDB		
		<p>S3 Bullet 2          RE: “My loan holder grant my forbearance for up to 12 months unless I specify an earlier end date”</p> <p>The existing form allows the borrower to request a start date. Is this intended that there’s not a field for them to request a begin/start date?</p>	Thank you for identifying this omission. It has been corrected in the revised version of the form.	changed
		<p>S3 Bullet 5          RE: “My forbearance will begin on the later of the date my loan holder determines...”</p> <p>As stated above, the existing form allows the borrower to request a start date, but it was omitted on this form. If that is not going to be a option, this bullet needs updated to read, “My forbearance will begin on the date my loan holder determines.”</p>	Thank you for identifying this omission. It has been corrected in the revised version of the form	changed
		<p>S3 Bullet 5          RE: “...or the date the program or service that qualifies me for forbearance began, as certified by the authorized official”</p> <p>This [mention of a certifying official] is not applicable to this form, as there is no certifying official. This needs to be removed.</p>	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed
		S5	Thank you for identifying this inconsistency. It has	changed

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		RE: “definition of authorized official”  This definition is not applicable to this form and should be removed.	been corrected in the revised version of the form.	
		S6 Section Title RE: “WHERE TO SEND THE COMPLETED <b>DEFERMENT</b> REQUEST”  This should state “FORBEARANCE”.	Thank you for identifying this inconsistency. It has been corrected in the revised version of the form.	changed