

1845-0102 Income Driven Repayment Plan Request for the William D. Ford Federal Direct Loans and Federal Family Education Loan Programs

ED-2025-SCC-0015

60 Day Public Comments

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ED-2025-SCC-0015-0006 Anonymous	**1. Summary of the Regulation** The Department proposes to renew an Information Collection Request (ICR) for the Fulbright-Hays Seminars Abroad Program, collecting application and selection data for short-term overseas study and professional development for U.S. educators. The data supports equitable program access and federal oversight of fund allocation. **2. Comments and Questions** On Necessity of the Collection (Point 1) - **Comment**: “This information collection is necessary to ensure transparency, accountability, and equitable access to federal funds in global education programming.” - **Supporting Evidence**: Oversight of federally funded education programs, such as Fulbright-Hays, requires detailed application data to evaluate geographic, demographic, and institutional diversity. Transparency promotes equitable access, as seen in Title VI programs (GAO, 2022, https://www.gao.gov/products/gao-22-105203). On Timely Use of the Information (Point 2) - **Comment**: “The Department should commit to publishing anonymized aggregate data annually to demonstrate timely	This form is for borrowers to apply for an Income Driven Repayment Plan. The comments provided appear to reference another information collection. No change.

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	use and enhance public trust.” - Supporting Evidence: Timely reporting improves stakeholder confidence and program participation. NSF's annual reports on fellowship applications show how rapid feedback improves applicant preparation (NSF, 2023, https://www.nsf.gov/statistics/). On Burden Estimate Accuracy (Point 3) - Question: “Has the Department surveyed previous applicants to validate the estimated 6-hour burden? Is this estimate inclusive of first-time applicants unfamiliar with federal forms?” - Supporting Evidence: Research suggests first-time applicants face a steeper time burden than returning users due to required narratives and budget justifications (Urban Institute, 2020, https://www.urban.org/research/publication/improving-access-federal-grants). On Improving Quality, Utility, and Clarity (Point 4) - Comment: “The Department should include optional demographic questions to assess outreach success among underrepresented educators and publish findings.” - Supporting Evidence: Demographic data is key to improving outreach in federally funded fellowships and assessing progress toward equity goals. For example, the Department of Education’s Civil Rights Data Collection enhances equity analysis in school programs (ED, 2021, https://ocrdata.ed.gov/).	

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	- Comment: “The Department should simplify language in the application instructions to align with federal plain language standards.” - Supporting Evidence: Plain language increases comprehension and reduces application abandonment. The Plain Writing Act of 2010 requires clarity in public communications (OMB, 2011, https://www.plainlanguage.gov/law/). On Minimizing Burden via Technology (Point 5) - Comment: “The Department should enable auto-population of applicant profiles via login.gov to reduce redundancy across submissions.” - Supporting Evidence: Login.gov integration has streamlined application burden for multiple federal services and aligns with recent GSA digital service modernization efforts (GSA, 2023, https://login.gov/). - Comment: “A downloadable sample application or annotated example would improve clarity and reduce trial-and-error formatting for educators.” - Supporting Evidence: Federal agencies such as the NIH provide sample proposals and application guides to minimize burden and increase submission quality (NIH, 2022, https://grants.nih.gov/grants/how-to-apply-application-guide.htm). 3. References and Citations - Government Accountability Office (GAO), 2022, “Actions Needed to Ensure Title VI Programs Achieve Their Goals,”	

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	https://www.gao.gov/products/gao-22-105203 - National Science Foundation (NSF), 2023, "NSF Graduate Research Fellowship Program Annual Report," https://www.nsf.gov/statistics/ - Urban Institute, 2020, "Improving Access to Federal Grants," https://www.urban.org/research/publication/improving-access-federal-grants - U.S. Department of Education (ED), 2021, "Civil Rights Data Collection," https://ocrdata.ed.gov/ - Office of Management and Budget (OMB), 2011, "Plain Writing Act Guidelines," https://www.plainlanguage.gov/law/ - General Services Administration (GSA), 2023, "Login.gov," https://login.gov/ - National Institutes of Health (NIH), 2022, "Application Guide," https://grants.nih.gov/grants/how-to-apply-application-guide.htm	
ED-2025-SCC-0015-0005 Emma Murphy	The SAVE option is necessary in a system which promotes the excesses of loan companies and suppresses the rights of all people to an affordable education in an economy that only prioritizes the wealth of the already wealthy. No job pays enough to comfortably pay student loans, and no college worth attending is affordable. The only options that remain are government assistance to citizens with outstanding loans or government plans to inject education with more funding and put caps on the amount that colleges are allowed to charge. This whole system is broken and this SAVE option is one of the only lifelines we who have loans have been given since the Carter administration. Do not remove it.	The Department thanks you for this comment, but on Feb. 18, 2025, a federal court issued a new injunction preventing the U.S. Department of Education (ED) from implementing the Saving on a Valuable Education (SAVE) Plan and parts of other income-driven repayment (IDR) plans. No change.
ED-2025-SCC-0015-	I wholeheartedly support my president and this administration, but I have to disagree with the stance on removing the SAVE	The Department thanks you for taking the time to

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0004 Stacy Alamond	plan. So many of us went into default because the compounded interest on already high loans were impossible to keep up with. Also, the IDR and other plans base salary on the total amount of household income. I was not married and did not know my current husband when I attended college, so it's my financial responsibility and I understand that. In my 30s I went to college while working full-time and taking care of my special needs son as a single mother. I achieved degrees in Information Design & Technology to provide a better life for my son. My son passed away in 2012 and I could not find a job in my field that wasn't currently being accomplished by AI. I now work as a receptionist with New York State (a job I did 25 years ago) so that I can benefit from the PLSF. I have 8 more years to go at 45 years old since I currently only make 41k per year. If I had to do it all over again regarding my education, I never would have attended. I have 2 degrees that cost me 96K. Between my husband and I we make 86K, but we barely get by as it is with our mortgage and car payments. The SAVE plan afforded me a way to survive and still remain current on my loans. Many people will say to me I made this choice and I have to live with the consequences. Yes, I made the choice to try and better myself, but if I have to pay \$1,000 per month for an education that I can't even use, then I will end up losing my home and my ability to get to my job. I understand that President Trump is trying to make our country more independent so they we don't have to depend on foreign entities, but he must know the working class are suffering the most while people who don't work at all get their rent and food paid for. Most people with college degrees strive to find a career and participate in this economy, so why can't our country find a way to help ease their burden?	provide this comment, but on Feb. 18, 2025, a federal court issued a new injunction preventing the U.S. Department of Education (ED) from implementing the Saving on a Valuable Education (SAVE) Plan and parts of other income-driven repayment (IDR) plans. No change.
ED-2025-	I have been paying my my student loans since 2018 (I	While we appreciate your

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SCC-0015-0007 Sarah Ferreria	originally borrowed \$151,430.25, a combination of undergraduate and graduate loans). I borrowed the money to lift myself out of poverty and working low-wage jobs that didn't allow me to make a living wage. I worked both part-time and full-time during school to help pay for my education. I graduated with good grades and I currently work a full-time job with benefits related to my field of study. I am currently in PAYE and as of today I've made 103 Qualifying Payments and have 137 Remaining Payments to make before my forgiveness is honored. I will be 46 in September of 2036 when my forgiveness is honored. Even though I am making monthly payments on the account, the balance is still climbing because the interest rate is higher than the required payment amount, essentially guaranteeing my debt until forgiveness is honored. I would like to formally submit this comment as a plea to please not change any laws surrounding student loan forgiveness. On behalf of hard-working tax-paying Americans who are desperate for student loan forgiveness, and those who are watching their loan amounts grow instead of shrink, changing the laws around the 20-25 year forgiveness would be incredibly detrimental and devastating to my life. Everyone deserves the chance to be lifted out of debt. Please do not change the laws about honoring forgiveness for hard-working tax paying Americans. Thank You.	comment, we would encourage you to reach out to your representatives in the US Congress regarding changes to federal law. No change.
ED-2025-SCC-0015-0008 Anonymous	All options should stay on the table when it comes to student loan repayment and forgiveness. Making loan forgiveness unattainable after x number of years of payments will leave us with a mass of debt slaves and negatively impact communities and the economy. Student aid was supposed to be a way to help level the playing field for all income levels to be able to afford an education, not only the wealthy. Federal and State gift aid programs alone are often a paltry percentage of actual	Thank you for your comment. On Feb. 18, 2025, a federal court issued a new injunction preventing the U.S. Department of Education (ED) from implementing the Saving on a Valuable

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	educational costs. If you do deny these options to borrowers, the option to have loans dismissed through bankruptcy needs to go back on the table.	Education (SAVE) Plan and parts of other income-driven repayment (IDR) plans. Borrowers do still have the ability to discharge their federal student loans through Bankruptcy. No change.
ED-2025-SCC-0015-0009 Anonymous	Do you need a financial help? Are you in any financial crisis or do you need funds to start up your own business? Do you need funds to settle your debt or pay off your bills or start a good business? Do you have a low credit score and you are finding it hard to obtain capital services from local banks and other financial institutes? Here is your chance to obtain a financial services from our company. We offer the following finance to individuals- *Commercial finance *Personal finance *Business finance *Construction finance *Business finance And many More: we give out loan at 2% interest rate; Contact Us Via Email:lissarobinson0@gmail.com	This form is for borrowers to apply for an Income Driven Repayment Plan. The comments provided appear to reference an unrelated topic. No change.
ED-2025-SCC-0015-0010 Anonymous	I am a student loan borrower who is employed with a defined qualified employer for PSLF and I am 12... payments away from being able to claim PSLF. Due to the fight over Biden, I could have been only 4 months away. I have followed all the rules and filed my paperwork religiously since I started in 2015. I am frustrated at the current pause and the slowness of processing paperwork and changes at the Department of ED,	Thank you for your comment. This form is for borrowers to apply for an Income-Driven Repayment Plan and is not directly related to Public Service Loan Forgiveness.

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	but changing the definition of a qualified employer for PSLF will render certain organizations unqualified. We need to keep a definition that is not loose and will define, without interpretation, who is a qualified employer to keep PSLF. For that definition to contain an arbitrary set of rules for who is and isn't a qualified employer will hinder many people from claiming what they have worked hard towards. For those of us that have put in the years of service to fulfill the qualifications to get PSLF loans, those loans should still qualify under PSLF and that program and the definition of qualified employer should remain the same. I also believe that we should keep PSLF and other IDR programs, these programs help to ensure that others will enter in to the job market for the qualified employers.	No change.
ED-2025-SCC-0015-0011 Anonymous	I understand the focus on student debt taken by students, but there is an often forgotten group of people that should have access to income driven repayment plans. These are the parents who have taken Parent PLUS loans and end up more in debt than the students taking out maximum Direct loans for both undergrad and graduate. Why are the parents excluded when in reality their loans are the same as student borrowers. You already have a built in forgiveness program, why not let them have advantage of at least one of the income driven plans. You have parents who are on social security or 401Ks and a generation that still may have their own student loans to pay off. Please consider including in these repayment plan options parents who do not have the means or limits in borrowing as students do.	Thank you for your comment. Borrowers that have consolidated their parent PLUS loans are eligible for the Income-Contingent Repayment plan which is one of the Income-Driven Repayment plans. Access for parent PLUS borrowers to other Income-Driven Repayment plans would require a change in statute. The Department cannot make this change without Congressional action. No change.

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ED-2025-SCC-0015-0012 Anonymous	On Maintaining Borrower Clarity Comment: The Department should clearly label the reverted IDR Request Form as a temporary version and commit to providing borrower outreach explaining the ongoing litigation and future changes to avoid confusion, especially for first-generation and low-income borrowers. Supporting Evidence: Confusing administrative processes disproportionately impact borrowers from historically marginalized communities. (Student Borrower Protection Center, 2023, https://protectborrowers.org/reports/barriers-and-burdens/) On Digital Access and Equity Comment: ED should ensure that the updated IDR form is mobile-optimized and available in multiple languages to close equity gaps for borrowers without broadband or fluent English literacy. Supporting Evidence: The FCC found 24% of Americans without home internet rely primarily on smartphones for access, underscoring the need for mobile-first design. (FCC, 2021, https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2021-broadband-progress-report) On Minimizing Recertification Burden Comment: ED should consider an interim policy allowing borrowers to self-certify family size for 2025 without income verification delays caused by form confusion or litigation	Thank you for your comments. 1. On Feb. 18, 2025, a federal court issued a new injunction preventing the U.S. Department of Education (ED) from implementing the Saving on a Valuable Education (SAVE) Plan and parts of other income-driven repayment (IDR) plans. This form will not be “temporary” unless we receive additional direction from the Court. 2. We would encourage borrowers that would like to use their mobile device to apply for an Income-Driven Repayment plan to use our mobile-responsive IDR application on StudentAid.gov 3. Thank you for your

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	interruptions. Supporting Evidence: During the COVID-19 emergency, self-certification successfully minimized borrower hardship without significant fraud. (Federal Student Aid, CARES Act Reports, 2021, https://studentaid.gov/announcements-events/coronavirus) On Protecting Borrowers in Administrative Forbearance Question: How will ED ensure that borrowers who experience delays due to SAVE Plan injunction changes are not wrongly placed into administrative forbearance or accrue additional interest? Supporting Evidence: Past administrative errors during repayment transitions have disproportionately harmed borrowers of color. (Brookings Institution, 2022, https://www.brookings.edu/research/student-loan-forgiveness-could-narrow-the-racial-wealth-gap/) On Reasserting Interest Subsidy Benefits Comment: ED should track and transparently report the number of borrowers who lose access to interest subsidies due to the SAVE rollback and prepare a public mitigation plan should SAVE be reinstated. Supporting Evidence: Interest accrual remains a major driver of ballooning student loan balances, especially among low-income borrowers. (Center for American Progress, 2022, https://www.americanprogress.org/article/why-student-debt-	suggestion to allow borrowers to self-certify their income and family size. 4. While we appreciate your comments, administrative forbearance, interest subsidies, discharges, and transparencies of the repayment plans are not related to the Income-Driven Repayment information collection. 5. The Department is committed to, and required by statute, to maintaining a process for borrowers to apply for an Income-Driven Repayment Plan using a paper form. 6. We appreciate your comment related to receiving borrower experience feedback.

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	cancellation-helps-borrowers-most-in-need/) On Borrower Defense and Discharge Alignment Comment: Borrowers navigating IDR changes should be proactively connected to closed school discharge, borrower defense, and total and permanent disability discharge pathways if eligible, to prevent unnecessary hardship during litigation-induced disruptions. Supporting Evidence: Integrated outreach across repayment and discharge programs maximizes borrower protections. (GAO, 2021, https://www.gao.gov/products/gao-21-5) On Timeline Transparency Question: Will ED commit to publishing a clear timeline with quarterly updates regarding the litigation's effect on IDR plan operations, so that borrowers can make informed decisions? Supporting Evidence: Lack of clear communication historically worsens borrower anxiety and undermines program participation. (Urban Institute, 2020, https://www.urban.org/research/publication/improving-student-loan-communication) On Paper-Based Processing Equity Comment: ED must ensure that paper-based submission of the revised IDR form remains fully available without additional processing delays for incarcerated borrowers or those living in broadband deserts.	7. We appreciate your comment related to the order by which forms are processed. No changes.

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	Supporting Evidence: 7% of American households still rely on paper forms to interact with federal programs due to digital divides. (Pew Research Center, 2021, https://www.pewresearch.org/internet/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/) On Borrower Experience Feedback Comment: ED should establish a fast-track mechanism for borrower feedback specifically on form usability and error issues during the emergency period to ensure the IDR Request Form remains responsive to real-world needs. Supporting Evidence: Iterative design based on real user feedback increases form accuracy and reduces processing time. (OMB, 2021, https://www.whitehouse.gov/wp-content/uploads/2021/06/M-21-23.pdf) On Prioritizing Vulnerable Borrowers in Recertification Comment: ED should prioritize processing IDR recertifications for borrowers nearing loan rehabilitation deadlines, Public Service Loan Forgiveness eligibility, or at risk of default. Supporting Evidence: Administrative triaging improves equity outcomes and prevents lifetime wealth losses among vulnerable borrowers. (National Consumer Law Center, 2023, https://www.nclc.org/resources/student-loans/)	
ED-2025-	My comments and concerns towards this topic goes into the	Thank you for your

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SCC-0015-0013 Dan Parker	direction of the Federal Family Education Loan Programs. The US department of education and its loans should give to the students who are in need for assistance the financial aid proper loans so that they wont be left to have a bill by the school to which they will eventually have to make the payment. I do appreciate the departments effort to try and help improve access to make it affordable repayment options for the students who do happen to graduate on time. But in the case to were a student transfers and changes there major holds them back from graduating and then they end up aging out of the process to receive financial aid which shouldn't be the case. Based on the family income and finances there should be aid and resources to help surrounded that student with as much help in order to graduate and not to have to worry about a school bill. Now borrowers under the FFEL program have historically faced more problems and challenges the repayment options compared to the direct loan borrowers. Students in school should be able to lean on these grants and loans for help to pay off there tuition how the payment options work everyone situation is different so in many cases there will be many details to go over like which loan will you sign up for and which grants are you eligible for to receive that finical aid and help. What could help is there is something thats called IDR plan request form which helps the user clear and have accessible to complete formats digitally or on paper could help the confusion when going over the school payments and options. It's also extremely important to that the department is taking the opportunity to ensure that the borrowers are fully informed of their rights and options when completing the forms. Things to consider for the Administration borrowers or students some may be dealing with unemployment, disability, or economic hardships being that having a structure plan to	comments. This form can be used for borrowers of a Federal Family Education Loan Program (FFELP) loan to apply for Income-Based Repayment (IBR) plan. No changes.

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	help the students. The revised IDR Plan Request form for FFEL borrowers has the potential to significantly enhance the outcome and streamline loan servicing trying to make sure that students are insured within the process. There are some cases where the IDR options fail to provide true financial relief to financially distressed borrowers. Which leads to the cause of the downfall economically for the students and families who continue to struggle with no help. We need to fix and correct the department so that families and parents won't have to worry that their kid isn't receiving the proper aid being given. The department's and boards of education have rules and steps they must follow when going through a matter as important as the financial aspect. These direct loans and grants even a refund check to help the student who might be going through a hardship many wouldn't understand. All the struggles and loops the lower class economic class of families can't always afford to give their kid or the student the best education that's when the departments are supposed to help and work with the families so that the student can receive proper education and living in order to succeed.	
ED-2025-SCC-0015-0014 Anonymous	The Department is updating the IDR Request Form to comply with the court injunction issued on February 18, 2025, which includes updates to remove the SAVE plan option, reverting the definition of family size to the pre-July 1, 2024, definition, and removing references to interest subsidy during repayment. The implications of these updates are significant, particularly for borrowers who transitioned from the old Income-Based Repayment (IBR) plan to the now-defunct SAVE plan due to its perceived benefits. These borrowers experienced capitalized unpaid interest accrued under the old IBR plan, which was added to the principal balance of their existing SAVE loans.	Thank you for your comments. The interest capitalization that occurs when a borrower leaves the Income-Based Repayment (IBR) plan is required by law and would require a change in the statute which is outside the abilities of the Department. No change.

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	This capitalization increases the total amount owed, leading to higher monthly payments and extended loan terms when they are compelled to switch to another plan, which may offer less favorable terms. When creating new applications and processes to force existing borrowers out of SAVE, they should be designed to mitigate the financial burden on borrowers. Borrowers should not be penalized with increased loan amounts due to capitalized interest on plans that are no longer available. If SAVE is not a valid plan, then any capitalized interest between these plans should be reversed as the application should never have been allowed and processed. It is crucial to consider reversing these capitalized amounts to ensure fairness and decrease risks exacerbating the financial strain on individuals who have already made efforts to manage their debt. For the inevitable analytics that suggest it will be of limited to no burden, there are those of us with significant loan amounts who have diligently been paying toward our loans to no avail. When you have a mortgage-worthy amount of student loan debt, pay off six figures worth of loans, and continue to have six figures worth of loans, it is easy to feel hopeless. To illustrate the gravity of the situation, I would like to share my experience. During the COVID-19 payment pause, I paid off four of my six remaining loans under old-IBR terms, amounting to over six figures. When the SAVE plan was introduced, I applied for my two remaining loans to be serviced under these new terms, which resulted in ≈\$43,000 of capitalized interest being added to my principal balance as required by statute. This was not an easy decision, but, after significant analysis of	

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	various repayment options and my situation, it was a viable path to eventually clearing my debt. I firmly believed that it was worth it to finally see a light toward the end of that tunnel. Alas, apparently that light was coming from a train intended to run me over. With the SAVE plan now being removed, I am faced with the “privilege” of paying an additional ≈\$43,000 in capitalized interest for a repayment plan that will no longer exist as I am forced to transition to yet a different plan. My current balance stands at ≈\$202,000 post-capitalization, despite having paid off more than this amount over the last 15+ years. I am committed to repaying what I owe, but the continuous changes and added burdens make it increasingly difficult to see a path to financial freedom. It is imperative that the Department addresses these issues fairly and considers the real-life impact on borrowers. A thoughtful approach to reversing capitalized interest and ensuring a smooth transition to new (unwanted and undesirable) plans, or even back to the original plans, will be essential in maintaining borrower trust and compliance. Fairly address these concerns, and I will happily and promptly pay off my remaining balance. Until then, I no longer possess any sense of urgency due to the continuous challenges and frustrations imposed by those who seem disconnected from the realities faced by their constituents who are being brow beaten over this entire debacle.	
ED-2025-SCC-0015-0015 Anonymou	Payments under IDR should be based on household, rather than individual income for the same reason Pell eligibility, and nearly every other public assistance program, is based on household income, regardless of how someone files their taxes.	Thank you for your comment. The determination of the monthly payment amount

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s	Doing otherwise means borrowers are able to minimize their payment obligation through their tax filing status, while at the same time reducing their available income with dependents NOT listed on their tax return. While a loan is ultimately the individual's responsibility, that does not mean that a publicly financed repayment assistance program, which can reduce someone's payment to as low as \$0 (a 100 percent payment subsidy) should only look at the individual. If a borrower is allowed to use only their personal income, then they shouldn't also be allowed to include household members not listed on their tax return. That is often both illogical (e.g. how can someone with near poverty level wages support several dependents on their own?) and amounts to having your cake and eating it too.	is calculated in accordance with applicable statutes and regulations and is not within the abilities of the Department to change through this form update. No change.
ED-2025-SCC-0015-0016 Anonymous	This change is really frustrating and feels like a setback for a lot of us. People are confused, and it doesn't feel like we're getting the support or clarity we need.	Thank you for your comment.
ED-2025-SCC-0015-0017 NASFAA	<PDF summary> Access to robust, easily accessible IDR plans is therefore crucial for individual borrower success and preventing default, as well as for the overall health of the student loan portfolio by keeping borrowers in repayment. ... Time-based forgiveness is a crucial element of any IDR plan as it saves borrowers from a lifetime of debt. ... NASFAA has concerns about the length of time that elapsed between the February 18, 2025, court decision enjoining the Final Rule provisions and the Department's March 21, 2025, request for emergency clearance of the revised form and IDR application being made available online again. ... As the SAVE plan litigation continues,	Thank you for your comments. This information collection is intended for use to apply for an Income Driven Plan as is available at the time the user is completing the form. Including information related to past options or describing changes from a previous version on the form itself would likely

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	we urge the Department to proactively anticipate any future changes to the IDR Request Form to limit the time the form needs to be offline as changes are made. ... The Department must prioritize clarity and plain language to improve the IDR form. The form should intuitively guide borrowers through currently available plans (IBR, PAYE, ICR) and their specific rules under the present legal constraints, avoiding jargon. It's crucial that the form be labeled as a temporary version due to the court injunction, that all communications to borrowers clearly explain why options like SAVE are unavailable, and that the interim form is subject to change. Removed: SAVE plan as an option for borrowers to select. Comment: This is the most impactful change for borrowers, especially those unaware of current litigation and expecting to enroll or benefit from SAVE's provisions. While the form clearly states which plans are available (IBR, PAYE, ICR), it should include accompanying guidance that explains why SAVE is not currently an option and what this means for past/current SAVE enrollees. Removed: "(Recommended) I want the income-driven repayment plan with the lowest monthly payment." Comment: The option for borrowers to select "the income-driven repayment plan with the lowest monthly payment" served as a crucial, simple entry point, particularly for those prioritizing immediate relief. While we acknowledge this choice might occasionally lead borrowers to plans with longer repayment terms or different forgiveness outcomes, its removal now forces borrowers to navigate the complex specifics of IBR, PAYE, and ICR. We recommend reinstating this language. To mitigate concerns about borrowers not	increase confusion particularly for borrowers initially selecting an IDR plan. Information related to changes to the IDR plans related to the injunction is available on our website for returning borrowers. Regarding the suggestion to reintroduce the "lowest payment" option. Due to the elimination of the SAVE Plan, the IBR and PAYE plans use the same formula for those borrowers that are eligible so there is no clear determination of what constitutes the plan with the lowest payment for many borrowers. The form encourages borrowers to complete the form online and use the loan simulator which shows the borrower the plans available to them and the payment amount and the terms of the plans providing them with the information necessary to make a selection.

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	understanding the full implications, the form could note that the “lowest payment” option may not always equate to the “lowest overall cost” or “fastest forgiveness,” thereby encouraging a comprehensive review of all plan details while still providing an accessible starting point for those most in need of immediate affordability. Removed: “However, you can consolidate your loans at StudentAid.gov/manage-loans/consolidation to access more beneficial income-driven repayment plans.” Comment: FFEL borrowers still need to know their options for access to other IDR plans if they choose consolidation. This guidance should be restored on the form. Added: “If you have Direct Consolidation Loans that repaid Parent PLUS loans, they are only eligible for ICR.” Comment: This addition is helpful for clarity regarding Parent PLUS loan eligibility post-consolidation. Changed: Reverting the definition of "family size" back to the definition used before July 1, 2024, for all IDR plans. Comment: NASFAA understands this reversion to the pre-July 1, 2024, definition of "family size" is a consequence of the Department’s interpretation of the court injunction. However, we wish to note our support for the updated definition that was in effect from July 1, 2024. That definition often provided a more accurate and inclusive reflection of a borrower's actual household and financial dependents, which could lead to more appropriate and manageable payment calculations.	Regarding the suggestion to restore language about consolidation for FFEL borrowers. Due to the elimination of the SAVE Plan, the borrower would only gain access to the ICR Plan (since they would not be a new borrower for PAYE or IBR) which is, generally, not a more beneficial plan than IBR as an existing borrower. While a FFEL borrower may benefit from eligibility for PSLF, instruction to consolidate loans into the Direct Loan Program is provided on the PSLF form. Thank you for your comments on the definition of “family size”. As a result of the injunction future changes to this definition would only be permissible by a change in the statute or through the regulatory rule-making process. No changes

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ED-2025- SCC-0015- 0018 National Consumer Law Center	The National Consumer Law Center, on behalf of our low-income clients, submits these comments in response to the U.S. Department of Education’s request for comments on the new Income-Driven Repayment (IDR) plan request form. As detailed below, we recommend changes to restore the option for borrowers to request to be placed in the plan with the lowest monthly payment, restore language assuring borrowers that if they are ineligible for the IDR plan they have selected they will be placed in the IDR plan for which they are eligible, fix current errors on the online IDR application, and revise the request form in accordance with plain language guidelines. Our comments reflect our expertise in the applicable IDR regulations as well as feedback from legal aid and consumer attorneys across the country who provide assistance to borrowers navigating their student loans and often applying for IDR. Our recommendations are intended to help ensure that the process of enrolling and remaining in IDR plans is as smooth and accessible as possible to all student loan borrowers, including the low-income borrowers who most rely on these plans. Recommendations: 1. Restore the option for borrowers to select "I want the income-driven repayment plan with the lowest monthly payment" to reduce the burden on borrowers to figure out which plan they are eligible for and increase access to IDR. In Section 3, Item 2, the new IDR request form instructs borrowers to “choose a plan” and provides three options: IBR, PAYE, or ICR. However, unlike prior versions of the IDR application since at least 2012, the new IDR request form eliminates the option for borrowers to request to be placed in the income-driven repayment plan with the lowest monthly	The Department thanks you for these comments, but on Feb. 18, 2025, a federal court issued a new injunction preventing the U.S. Department of Education (ED) from implementing the Saving on a Valuable Education (SAVE) Plan and parts of other income-driven repayment (IDR) plans which affect how borrowers apply for the IDR plans including placing the borrowers in the lowest monthly payment option and placing borrowers on a different plan if they applied for a plan they don’t qualify for. Comments unrelated to this form cannot be considered during this information collection. No changes.

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	payment for which they qualify. For over a decade, for good reason, the Department has included some version of the following option on IDR request forms: “(Recommended) I want the income-driven repayment plan with the lowest monthly payment.” We strongly recommend that the Department restore the option for borrowers to request to be placed in the IDR plan that they qualify for that has the lowest monthly payment. This option is important to borrowers who will otherwise struggle to correctly identify which IDR plan(s) they are eligible for, as well as which offers the most affordable payments. Removing this option will create more friction and “analysis paralysis” in the application process, requiring borrowers to spend more time completing the request form and potentially putting off or not applying at all. Even more problematically, it will result in more borrowers who cannot afford standard payments having their IDR applications denied simply because they did not correctly identify which of the three available IDR plans they are eligible for. Such denials, which may occur after a borrower has already waited months for their request to be processed, may at best delay borrowers’ efforts to begin making payments (if they reapply successfully) and at worst cause borrowers to believe they are not eligible for an affordable payment plan at all, thereby increasing their likelihood of default. Each of the IDR plans has different, complex eligibility requirements that even servicer call agents struggle to understand or explain and that FSA’s own application appears to currently be getting wrong. Borrowers then cannot reasonably be expected to understand and correctly navigate their IDR eligibility. Further, even aside from eligibility, borrowers struggle to choose among the plans or to figure out which will be most affordable for them. This is because the plans calculate monthly payments in different and	

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	often complex ways that make it hard for borrowers to compare their options. For example, ICR calculates payments using the interaction of two separate formulas, one of which relies on changing information published annually outside of the IDR request form. While the online application makes it easier for borrowers to identify which plans they are eligible for and which plan offers the lowest monthly payment (at least when it is operating correctly, which it is currently not — see Recommendation 4a below), the paper/PDF application does not. And importantly, the paper/PDF application is more likely to be used by the same borrowers who are also unable to access or confidently navigate FSA’s other online tools, including the Loan Simulator, that could help them figure out which plans they are eligible for and which would offer the most affordable payments. This includes older borrowers, borrowers with disabilities, borrowers who are incarcerated, borrowers who have experienced identity theft, borrowers who simply have difficulty setting up or restoring studentaid.gov accounts, and other borrowers with limited access to or comfort with online portals. These groups of borrowers already have some of the highest rates of delinquency and default; making it harder for them to successfully enroll in IDR using the paper application form threatens to make a bad situation worse. Finally, we recognize that the Department may have removed this option in response to the current preliminary injunction blocking the SAVE plan, perhaps due to concern that it would be unclear whether borrowers who select this option should be enrolled in the SAVE plan (and placed in the SAVE forbearance) or in whichever of IBR, PAYE, or ICR offers the lowest payment. A better approach is to restore the question and to simply make clear that the borrower will only be placed in one of the plans for which the Department is currently	

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	enrolling borrowers, and the Department is not currently enrolling borrowers in SAVE. 2. Restore language assuring borrowers that if they request a plan that they are not eligible for, they will be placed in the IDR plan that they do qualify for with the lowest monthly payment. For the same reasons detailed above, we strongly urge the Department to restore the language from prior IDR request forms assuring borrowers that if they do not qualify for the IDR plan they have requested, they will be placed in the IDR plan that they do qualify for that has the lowest monthly payment. Alternatively, the Department could bring back language setting out a specific waterfall approach that it will use to enroll borrowers in an IDR plan if they choose a plan for which they are not eligible (e.g., the Department could reasonably state either that it will try to place such borrowers in PAYE, then IBR, then ICR). Such language assures that borrowers who want to access an IDR plan but quite reasonably misunderstand the complex eligibility criteria for each plan, and thus choose the wrong one, will still be enrolled in an IDR plan. The new language that the Department has inserted to replace this old assurance instead provides for the opposite: “If I do not qualify for the plan or plans I requested . . . my loan holder will reject my application.” As explained above, rejecting these IDR requests entirely even when a borrower is eligible for another IDR plan, often when a borrower has already waited months for their application to be processed, will result in borrowers who cannot afford standard payments at best experiencing delays and more friction in getting into a plan for which they can successfully make payments (if they reapply successfully) and at worst cause borrowers to believe they are not eligible for an affordable payment plan at all,	

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	thereby increasing their likelihood of default. 3. Improve usability of the form in accordance with plain language guidelines. We recommend that the Department work with plain language experts to improve the IDR request form and engage in user-testing to ensure that the public will be able to easily understand and use it. Under the Plain Writing Act of 2010, the Department of Education is required to write “clear Government communication that the public can understand and use.”¹ This requirement applies to any communication that is necessary for obtaining any federal government benefit or service; provides information about any federal government benefit or service; or explains to the public how to comply with a requirement that the federal government administers or enforces. Unfortunately, the IDR form falls short of being clear and easy-to-use by the public. The first rule of the Federal Plain Language Guidelines is “Think about your audience.”² In the past, the Department has seemingly assumed that the audience for these types of forms is entirely college-educated individuals. However, the population that may submit an IDR form is much more varied, and student loan borrowers without a college degree are among the most at risk of default if they do not successfully enroll in IDR. The population of borrowers likely to use the IDR request form includes individuals without a GED or high school diploma who borrowed federal aid,³ individuals who began but did not complete a postsecondary education program, people who attended a certificate trade program, and Parent PLUS borrowers who may not have attended college at all. Scrutinizing the form with the federal government’s plain language guidelines⁴ would assist all applicants and help ensure the borrowers otherwise most at risk of default can access affordable payments. As the	

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	Department revises the form, it should solicit review and user testing from plain language experts to make sure the design of the form is accessible for all borrowers. The Department should, at a minimum, submit the form to its own Plain Language Department. 4. Fix errors in the online IDR application: a. Fix error preventing borrowers who qualify for PAYE from selecting PAYE in the online application Student loan attorneys report that borrowers who meet the eligibility criteria for the PAYE plan are nonetheless being blocked from newly enrolling in the PAYE plan via the online IDR application. This may be due to a failure to properly update the application and IDR processing to reflect either: (1) the final rule published on January 15, 2025 amending the IDR regulations to allow new enrollments in PAYE through July 1, 2027 rather than sunseting new enrollments on July 1, 2024 (90 Fed. Reg. 3695, amending 34 C.F.R. § 685.209(c)(4)(iv)), or (2) the Department’s interpretation of the preliminary injunction in <i>Missouri v. Trump</i> as enjoining the entire 2023 IDR regulations and thus reverting governing law to the prior IDR regulations, including 34 C.F.R. 685.209(a) (2022), which does not sunset PAYE enrollment. We encourage the Department to promptly fix this application error as it is preventing borrowers from accessing a repayment plan for which they are eligible, and which may be some borrowers’ best repayment option. It may also lead more borrowers who know they should be eligible for PAYE to turn to the paper application form instead, which is slower to process and may result in more processing errors. Additionally, we encourage the Department to ensure that servicers processing IDR applications or instructing borrowers on plan eligibility are using the correct eligibility criteria, and are not incorrectly preventing borrowers from	

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	enrolling in PAYE. b. Fix error requiring uploading of spousal income information (including duplicate information) where not required. Student loan attorneys report that the online application now seems to require uploading of spousal income information regardless of whether the IDR plan the borrower has requested or the tax filing status of the borrower makes submission of spousal income information necessary. Further, some report that borrowers who file their taxes as married filing jointly appear to be required by the online application to upload their joint tax return twice – once for the borrower, and once for their spouse. This creates unnecessary and inefficient burdens on borrowers and their spouses. Further, the extraneous income information may then result in payment calculation errors. For these reasons, the Department should promptly investigate and correct this issue. c. Restore data-matching with Treasury to improve the efficiency, ease, and accuracy of IDR enrollment and recertification. We urge the Department to promptly restore and implement data-matching systems with Treasury to simplify and streamline the process of enrolling in and recertifying income in IDR. First, we encourage the Department to fully implement the FUTURE Act, including its automatic enrollment and recertification provisions premised on data-matching with Treasury, as soon as possible. Doing so will both dramatically reduce paperwork burdens on borrowers and should increase successful repayment and reduce default by addressing the	

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	widely acknowledged problem of borrowers missing their recertification paperwork deadlines and experiencing unaffordable payment jumps. Second, even as it works on full implementation of the FUTURE Act, we encourage the Department to restore the prior ability to import tax returns into the online IDR application using a one-time match. Doing so simplifies and speeds up the IDR application process and reduces risk of errors for all borrowers. Additionally, it is particularly valuable to struggling borrowers who seek help with their student loans at clinics or in other settings where they may not otherwise have access to their tax returns. Conclusion Thank you for the opportunity to comment on the proposed IDR plan request form. We would welcome the opportunity to meet with the Department to discuss ways to make the IDR application process more accessible and less burdensome to borrowers. Please contact Abby Shafroth (ashafroth@nclc.org) with questions or if you would like to discuss further. Sincerely, Abby Shafroth Co-Director of Advocacy and Director of Student Loan Borrower Assistance project National Consumer Law Center	
ED-2025- SCC-0015- 0019 CPAC Foundatio n Center for Regulatory Freedom	Below are comments of the American Conservative Union Foundation's (d/b/a. Conservative Political Action Coalition Foundation) (hereinafter "CPAC Foundation") Center for Regulatory Freedom (hereinafter "CRF") on the Department of Education's (ED) information collection request entitled "Agency Information Collection Activities; Comment Request; Income Driven Repayment Plan Request for the William D. Ford Federal Direct Loans and Federal Family Education Loan Programs," Docket Number ED-2025-SCC-0015, published in the Federal Register on April 7, 2025. CRF is a project of the CPAC Foundation, a non-profit, non-	Thank you for your comments and support, but this form is for borrowers to apply for an Income-Driven Repayment Plan and is not related to any proposed changes to statute. We would encourage you to reach out to your representatives in the US Congress regarding changes to

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	partisan 501(c)(3) research and education foundation. Our mission is to inject a common-sense perspective into the regulatory process, to ensure that the risks and costs of regulations are fully based on sound scientific and economic evidence, and to ensure that the voices, interests, and freedoms of Americans, and especially of small businesses, are fully represented in the regulatory process and debates. Finally, we work to ensure that regulatory proposals address real problems, that the proposals serve to ameliorate those problems, and, perhaps most importantly, that those proposals do not, in fact, make public policy problems worse. CRF is grateful for the opportunity to comment on ED's revised collection of information concerning revisions to the Saving on a Valuable Education (SAVE) and Income-Driven Repayment (IDR) plans. CRF supports the current administration's proposed changes to IDR plan requests, as such changes are necessary to comply with regulations at 34 C.F.R. § 685.209 and the Direct Loan Program under Section 493C of the Higher Education Act of 1965 (HEA). Additionally, ED's emergency revisions are crucial to combatting the burgeoning economic collapse brought on by decades of over lending and the federal government's exorbitant subsidization of college degrees. CRF approves of regulatory revisions that aim to curb federal spending, particularly as that spending relates to ED's ownership and management of Direct Loans for higher education. CRF urges ED to review future regulations in conjunction with the HEA, specifically the process by which the federal government authorizes and limits federal student loan programs, as well as student loan debt forgiveness. CRF also recommends that ED reexamine its framework for issuing relief	federal law. No changes.

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	for federal student loans, as the current repayment model mirrors the reckless lending practices that led to the 2008 housing crisis. Introduction Upon further review of ED’s revised information collection, CRF finds that SAVE and the supporting IDR plan revisions should be implemented to help streamline the federal student loan process. CRF has determined that the proposed revisions made to the SAVE and IDR plans, if enacted, will simplify the application for borrowers to apply for loans and extend the period for which federal loans can be forgiven from 10 or 20-25 years to 30 years. The extended pay period will make it easier for lending institutions to determine the number of borrowers that are eligible for federal student loan funding and allows them sufficient time to verify important eligibility information, such as annual income and household size. In 1965, Congress passed the HEA to improve student services and the administration of academic support. Section 455(d) of the HEA authorizes income-contingent repayment (ICR) plans for borrowers who obtain student loans through the Direct Loan Program, which originated under the Clinton administration in the 1990s.¹ Collectively, these two plans are referred to as IDR plans. Under current regulations, there are four types of IDR plans available for students pursuing higher education. These include the Revised Pay As You Earn (REPAYE), Income-Based Repayment (IBR), Pay As You Earn (PAYE), and Income-Contingent Repayment (ICR) plans, all of which base your monthly payments on your income and family size, and offer loan forgiveness after 20 or 25 years of qualifying payments, depending on the specific plan.	

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	In 2021, the Secretary of Education (Secretary) initiated a rulemaking process to create a new IDR plan to address the multitude of borrowers struggling to afford their payments and the propensity of student loan borrowers to default on their loans or end up financially delinquent. This rulemaking process culminated in the promulgation of a final rule on July 10, 2023, wherein the Biden Administration formally replaced the REPAYE plan with the SAVE plan.² The SAVE plan allowed borrowers earning less than \$32.8k as an individual, or less than \$67.5k as a family of four, to pay \$0 in monthly payments on their loans, effectively authorizing the federal government to assume the cost of all interest payments under the plan.³ The replacement of REPAYE with SAVE widely expanded the pool of potential student loan borrowers by instituting automatic enrollments for borrowers who are more than two months behind on payments into the IDR plan and allowing “smaller” loan balances to be completely forgiven after only 10 years of payments, as opposed to the REPAYE plan’s standard 20 to 25 year requirement regardless of balance. ED’s plan for student loan forgiveness faced a plethora of legal hurdles, most recently on February 18, 2025, wherein the United States 8th Circuit Court of Appeals issued a preliminary injunction blocking the full implementation of the SAVE plan, including its provisions guaranteeing full debt forgiveness.⁵ The court extended the injunction to also halt loan forgiveness under the PAYE and ICR plans and further directed the lower court to broaden the injunction to cover the entire SAVE rule and related rules.⁶ As a result, ED suspended access to all IDR plans and froze the online application process for the programs. On March 26, 2025, the online IDR application	

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	became available again, allowing borrowers to once again apply for IDR plans, though access to the SAVE plan remains blocked. Proposed Revisions to IDR Plans The proposed revisions will significantly reduce the number of options of borrowers under IDR plans, allowing only borrowers with loans dispersed before July 1, 2026, to keep their current repayment plan, except for those under the ICR plan. The new options will allow borrowers to choose between a standard repayment plan with fixed monthly payments for 10-30 years and a new income-based repayment plan, “Repayment Assistance Plan (RAP).”⁸ The latter offers a fixed monthly payment with loan terms ranging from 10 to 25 years, depending on the amount borrowed. The new plan would also instill borrowing caps, such that undergraduate borrowers would be limited to borrowing under the \$50k limit, graduate borrowers would be limited to borrowing under \$100k, and professional borrowers would be limited to \$150k.⁹ The proposed revisions would also eliminate subsidized loans, such as the grad PLUS loan program, thereby encouraging greater fiscal responsibility in federal lending and helping to limit taxpayer exposure to the costs of graduate and professional education. While previous plans forgave outstanding loans over a period of 20 to 25 years, the proposed plan would extend the qualifying loan forgiveness plans to 360 payments, or a period of 30 years. For those borrowers who made payments before the plan’s new revisions, their payment would count towards their outstanding time required to pay off their loans. It is important to note that the previous administration’s SAVE plan	

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	was projected to cost the federal government upwards of \$400 billion,¹⁰ and ED's proposed revisions, if implemented, would halt spending and prevent Americans from incurring the total cost of previous administrations' failed student loan policies. Lessons From the 2008 Housing Crisis Government policies in the early and mid-2000s drastically expanded the availability of mortgage credit, as federal mandates required Fannie Mae and Freddie Mac to increase their purchases of mortgages serving low- and moderate-income borrowers, leading these agencies to buy \$434 billion in securities backed by subprime loans between 2004 and 2006.¹¹ By offering loans to increasingly high-risk borrowers, often with little income verification and low initial interest rates, lenders fueled a surge in home purchases that contributed to rapidly rising housing prices and widespread defaults, ultimately resulting in the collapse of the housing market in 2008. Though the housing crisis was characterized by over lending and a failure to ensure properties purchased would generate a return on investment, the current higher education crisis is likely to follow a similar economic trajectory. As with the housing market, easy access to credit has enabled institutions to raise tuition and encouraged students to accrue debt that many may never be able to repay, raising the risk of widespread defaults and significant financial consequences for both individuals and taxpayers. ED's proposed revisions are a sharp course correction to the federal government's unsustainable accrual of student loan debt, particularly the implementation of borrowing caps and aggregate limits for student borrowing.	

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	Unlike real estate, degrees do not guarantee a return on investment, and the disconnect between the cost of education and post-graduation outcomes places both individuals and taxpayers at risk. Many students take on significant debt for degrees that may not lead to sufficient earnings to cover their loan obligations, creating a cycle of financial hardship and increasing the likelihood of default. This not only undermines the financial stability of borrowers but also exposes taxpayers to the costs of loan forgiveness and government-backed losses. By restricting access to uncapped federal loans, especially for programs with uncertain economic value, these reforms help ensure that federal funds are directed toward borrowers who are more likely to fulfill their repayment obligations, reducing the risk of another taxpayer-funded bailout. Conclusion Unchecked federal lending in higher education risks repeating the mistakes of the housing crisis, where easy credit led to unsustainable debt burdens and widespread defaults. Without meaningful limits, student loan programs can incentivize both over-borrowing by students and unchecked tuition increases by institutions, further distorting the higher education market. ED's recent revisions to its information collection on IDR plans represent a proactive step to address these risks by introducing borrowing caps and aggregate limits that better align loan accessibility with realistic repayment prospects. These changes not only protect borrowers from long-term financial distress but also safeguard taxpayers from the escalating costs associated with loan forgiveness and federal guarantees. CRF supports ED's proposed revisions concerning	

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	the collection of information relating to IDR plans, as well as broader policies aiming to limit lending and loan accessibility. CRF urges ED to continue to review and revise existing regulations governing student loan forgiveness to ensure that all current plans appropriately restrict lending practices in a manner consistent with minimizing systemic financial risk.	
ED-2025-SCC-0015-0020	I recommend taxing corporations at 90% and using the revenue to first pay for any American kid who wants to go to college or trade school for a 4 year degree. It is the corporations who have benefited from American kids being educated they should pay for it.	While we thank you for your comment, it is not related to the Income-Driven Repayment information collection. No changes.
ED-2025-SCC-0015-0021	This collection should be reviewed for changes based upon the significant impact of cost associated and for the legal implications of the contract terms. With the regulatory process and the verification of the data being conducted in accordance with the law, there are too many questions about how the contract would work effectively.	Thank you for your comment, but this information collection is for the Income-Driven Repayment form and its content. It is not related to budgetary impact. No changes.