OMB Number 1845-0102 – Income Driven Repayment Plan Request 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	Katherine Grow	I am writing to submit comments regarding the above-referenced rulemaking. My primary concern is that any final rule must make student loan repayment genuinely affordable for all borrowers, with particular attention to families and low- to middle-income households. 1. Family size alone is an insufficient measure of affordability. While family size should be considered, it does not capture regional cost-of-living differences, medical expenses, caregiving responsibilities, or other essential costs. The Department should base affordable payments on a more holistic measure—such as a generous income protection amount tied to regional poverty guidelines plus reasonable allowances for dependent care and necessary expenses. 2. Repayment plans must be as affordable as possible. I urge the Department to adopt or preserve income-driven repayment (IDR) plans with: A low monthly percentage of discretionary income (e.g., 5% for undergraduate loans, with a lower or zero payment for very low earners).	Thank you for your comments, but they are outside the scope of this collection. The Department is seeking comments on the updates to the Income-Driven Repayment Plan Request for William D. Ford Federal Direct Loans and Federal Family Education Loan Program based on the *One Big Beautiful Bill Act* (OBBBA). The Department cannot make the changes requested due to the statutory requirements of the OBBBA.	No change

		A high income protection threshold (at least 150-200% of the federal poverty guideline for the borrower's family size and location). No negative amortization that grows borrowers' balances over time. Automatic recertification to prevent procedural defaults. 3. Protect Public Service Loan Forgiveness (PSLF) and other forgiveness pathways. Weakening or eliminating PSLF would harm millions of teachers, nurses, firefighters, and other public servants. The Department should maintain PSLF with clear, simple qualifying rules and ensure that all IDR payments (including $0 payments) count toward the 120-payment requirement. Similarly, keep loan forgiveness after 20 or 25 years in IDR without unnecessary tax hurdles at the federal level. 4. Expand affordability in repayment plans. Affordability means more than low payments. It also means: Extending IDR eligibility to all Direct Loan borrowers regardless of loan type or disbursement date. Capping total interest accrual so balances		

		do not balloon for borrowers making good-faith payments. Allowing borrowers to easily switch between repayment plans without penalty or capitalized interest. Providing a straightforward application process accessible to borrowers with disabilities, limited English proficiency, or without reliable internet access. In summary, the Department should design repayment rules that treat true economic hardship as the guiding principle—not just family size. Please keep PSLF intact, preserve multiple forgiveness pathways, and make every repayment plan as affordable as possible for all borrowers.		
0005	NCLC	To ensure the new IDR Request Form and the underlying student loan processes accurately reflects the new repayment regulations, we recommend the following:		
		Section 10: Definitions for the PAYE Plan:		
		This section should be updated to reflect changes to the eligibility rules. It currently asserts that “[a] partial financial hardship is an eligibility requirement for the PAYE plan.” This is incorrect; the RISE regulations eliminated this requirement. The entire paragraph regarding partial financial hardships in PAYE should thus be deleted, and the following paragraph	Proposed Response: Thank you for your comments, but OBBBA removed the Partial Financial Hardship (PFH) requirement for the income-based repayment plan (IBR) not the Pay As You Earn (PAYE) plan. No changes will be made.	No change

		should also be updated to omit reference to partial financial hardship. Additionally, the Department should ensure that its online IDR application, IDR application processing system, Loan Simulator / Repayment Estimator, servicer training materials, and borrower-education materials are updated to reflect that borrowers will no longer need to demonstrate a partial financial hardship to enroll in PAYE effective July 1, 2026.		
		Section 11 - Table of Income Driven Repayment Plan Requirements and Information:		
		Income Eligibility should likewise be updated for PAYE to remove the assertion that borrowers must have a partial financial hardship to be eligible for PAYE, which will no longer be true effective July 1, 2026. We recommend deleting this row entirely, as no plans will carry income eligibility restrictions after July 1, 2026.	Thank you for your comments, but OBBBA removed the Partial Financial Hardship (PFH) requirement for the income-based repayment plan (IBR) not the Pay As You Earn (PAYE) plan. No changes will be made.	No change
		Borrower Eligibility: Should be updated for PAYE, IBR, and ICR to reflect the change to eligibility terminating access for borrowers who take out any new loans caused by the RISE rules. Specifically, add “You must not have taken out any Direct Loans (including Direct Consolidation Loans) on or after July 1, 2026.” to the borrower eligibility terms for PAYE, IBR, and ICR.	Thank you for your comment. The Department agrees this is a necessary modification. The language for the description of the legacy plans has been updated to include “and have no loans (including a Consolidation Loan) disbursed on or after July 1, 2026”.	Change
		Borrower Eligibility: Additionally, the current description of PAYE borrower eligibility in the table is likely to confuse	The Department appreciates your comment, but the “new borrower” description for PAYE has not changed due to the OBBBA, and therefore will	No Change

		borrowers and should be clarified in light of the new rules. The entire explanation of PAYE borrower eligibility is currently "You must be a "new borrower" with eligible Direct Loans." Borrowers may reasonably take this to mean that PAYE is available to new borrowers after July 1, 2026, when in fact such borrowers will be ineligible. We recommend changing to "You must be a new borrower on or after October 1, 2007 who also received a loan on or after October 1, 2011." This language should be in addition to the recommended added language above ("You must not have taken out any Direct Loans (including Direct Consolidation Loans) on or after July 1, 2026.").	not be modified. No change.	
		Borrower Responsibility for Interest: The entry for PAYE inaccurately states that borrowers in PAYE "will be responsible for paying all of the interest that accrues." This should be changed, because by regulation (including the final RISE rules), PAYE interest subsidies are identical to IBR interest subsidies. See 34 CFR 685.209(h)(2). The entry for PAYE should therefore be replaced with the same entry used for IBR. The Department should further ensure that its systems and those used by its loan servicers properly apply interest subsidies in the PAYE program consistent with the regulations, and should audit its instructions and servicers to ensure that borrowers received proper interest	Thank you for your comment. The Department agrees with the suggested changes. The language describing interest accrual under the PAYE plan has been updated.	Change

		subsidies in PAYE in the past.		
		Leaving the Plan: The entry for IBR states that borrowers leaving the plan will be placed in the standard plan. However, the RISE rules and other portions of the application state that borrowers may switch from IBR to RAP if they choose without going through the standard plan. We recommend changing the language to read "At any time, you may change to any other repayment plan for which you are eligible. If you wish to switch to a plan other than RAP or the standard plan, then you must either first make one payment in the standard plan or request a 1-month forbearance in your request to switch plans."	Thank you for your comment. The Department agrees, and the language has been updated to provide additional clarity on borrower repayment options.	Change
		RE: Question 2: For the PDF/paper version of the form, we recommend adding an option to allow borrowers to request to be enrolled in the plan with the lowest monthly payment. This was an option on prior versions of the IDR form. It ensures that borrowers who need income-driven repayment to successfully manage their loans and avoid default do not miss out because they select a plan they are ineligible for due to the complex and changing plan rules. We recognize that this option may not be necessary on the online IDR application because the online application integrates with studentaid.gov to identify for borrowers which plans they are eligible for and which plans offer the	Thank you for your comment. The Department's General Council's current interpretation of the statute does not permit the borrower to defer the selection of their repayment plan to the Secretary except in the case when they make no selection which would then place them on the Standard or Tiered Standard plan. For this reason, the "lowest monthly payment" option has been removed from the form. No change.	No change

		lowest monthly payments. However, for borrowers completing applications via paper or PDF, it can be very complicated to determine which plans the borrower is eligible for and to choose among them – indeed, even the Department's own proposed IDR request form included incorrect information regarding PAYE eligibility in multiple places (see items 1 and 2a above). The widely-recognized complexity of the repayment eligibility rules should not, and need not, be a barrier to accessing affordable payments.		
		Section 11 - Table of Income Driven Repayment Plan Requirements and Information.		
		Payment amount: Consider including the definitions of discretionary income here to make it easier for borrowers to understand how payments are calculated and to compare the options.	Thank you for your comment. Discretionary income is defined for each repayment plan in Section 10, and therefore, the Department does not believe this change is necessary. No change.	No Change
		Principal Matching Payment: To simplify, consider deleting "not to exceed $50" at the end of the RAP entry, as it is unnecessary in light of the language specifying "if your payment is less than $50."	Thank you for your comment. The Department agrees that the language in this section needed to be modified. To ensure consistent messaging, the text has been updated, but it is in alignment with the www.StudentAid.gov website.	Change
		Leaving the Plan: The entry for IBR may be read in the context of the entries for the other plans to suggest that borrowers may *not* switch from IBR to other plans at any time. But borrowers in IBR can switch at any time, they need only sometimes check an additional application box. Our recommended language on page 2 (item 2(d)) above would address this.	The Department appreciates your comment and has updated the language accordingly.	

		Add a row on forgiveness: This table provides most of the key IDR plan features borrowers and counselors need to compare IDR plans, but omits an important component of IDR for many borrowers: loan forgiveness. We recommend adding a row identifying forgiveness features of each plan. Clearly defining these periods – 30 years for RAP, 20 years for PAYE, 20 years for IBR for new borrowers after July 1, 2014 and 25 years for pre-July 2014 borrowers, and 25 years for ICR – is essential for borrowers to make informed decisions.	Thank you for your comment. The Department agrees that the forgiveness information should be included. A row was added titled “Repayment Term” to address this need.	Change
0006	NASFAA	NASFAA appreciates the introductory text in Section 2, highlighting that the form is easier to complete online, suggesting borrowers utilize the loan repayment calculator, and stating that borrowers never need to pay for assistance with their federal student loans. This information is valuable to borrowers and provides them with useful resources.	The Department appreciates your support.	No Change
		On Item 2 of Section 2, borrowers select their repayment plan. There is a box with notes on which repayment plans are available to certain borrowers. While some of this information makes sense to have in a separate note, we suggest moving some of the information to the actual repayment plan selection area. We suggest the following: 2. Choose a plan and then	Thank you for the comment. While the Department agrees your suggestions would be an improvement to the form, we would be unable to execute such revisions before the form must be available. We will consider this change for future versions of the form. However, we did modify Item 2 to provide additional clarity before the user selects a plan related to plan eligibility based on the disbursement dates of their loans.	No Change

		continue to item 3. Note: If you have any loan disbursed on or after July 1, 2026 (including a Consolidation Loan), you are only eligible for the Repayment Assistance Plan and/or the Tiered Standard Plan for ALL of your Direct Loans (regardless of when they were received), meaning the only income-driven repayment plan you are eligible for is the Repayment Assistance Plan. 2A. Repayment plans available to borrowers with ONLY loans disbursed before July 1, 2026. If you had a loan disbursed on or after July 1, 2026, skip Section 2A and proceed to Section 2B. Repayment Assistance Plan Income-based Repayment (IBR) Plan Pay As You Earn (PAYE) Repayment Plan Income-Contingent Repayment (ICR) Plan Note: If you have FFEL Program loans, they are only eligible for IBR. If you have Direct Consolidation Loans that repaid Parent PLUS loans, they are only eligible for ICR (you are then eligible to apply for IBR after having made at least one payment		

		under the ICR Plan - See Section 10 for more information). 2B: Repayment plans available to borrowers with ANY loan disbursed on or after July 1, 2026. Repayment Assistance Plan		
		We also recommend adding a brief explanatory statement to both sections (2A and 2B) defining the term “disbursed” so borrowers can more easily identify which section of the form they should complete. Without additional clarification, borrowers may not understand that “disbursed” refers to the date loan funds were paid out, which could lead to confusion about which section applies to their circumstances.	Thank you for your comment. The Department agrees and has updated the text to clarify disbursed refers to a loan being “paid out”.	Change
		In Section 3, we understand the questions were revised to capture both family size and number of dependents since existing IDR plans use family size and the Repayment Assistance Plan uses the number of dependents for the calculation of monthly payments. However, it is unclear to us when the Department uses these self-reported responses versus when federal tax information (FTI) from the IRS via the FUTURE Act Direct Data Exchange (FA-DDX) would be used. While this level of detail does not need to be included on the IDR request form itself, NASFAA requests that the Department provide clarification on the following information	Thank you for your comment. This is outside of the scope of this information collection, but the Department will take this into consideration for additional updates and guidance for www.StudentAid.gov.	Change

		through guidance or other resources outside of the form:		

		• If a borrower provides the necessary consent and the transfer of FTI is successful, is the number of dependents claimed on the tax return always used in the calculation for the Repayment Assistance Plan monthly payments? • If a borrower provides the necessary consent and the transfer of FTI is successful, and the borrower selects any IDR plan other than the Repayment Assistance Plan, is FTI used in the family size calculation? If so, does the calculation use the sum of the number of dependents claimed on the tax return, plus the borrower themselves, and their spouse (if married)? Or, does the response from item 6 get added to this sum as well? • 685.209(l)(2) states, "If a borrower (and their spouse, if applicable) does not provide approval for the disclosure of applicable tax information under sections 493C(c)(2) and 494(a)(2) of the Act when completing the promissory note or on the application form for an IDR plan, the borrower must provide documentation to the Secretary—(i) For the Income-Based Repayment plan, of the		

		borrower's income and family size; or (ii) For the Repayment Assistance Plan, the borrower's income and the number of dependents of the borrower." Do the self-reported responses in items 5 and 6 on the IDR request form satisfy the documentation requirement, or would ED use the number of dependents claimed on the tax return in the calculation since the borrower is instructed to provide a copy of their tax return/transcript? What would ED use in the event there was a discrepancy between the tax return/transcript and the self-reported responses in items 5 and 6? • Similarly, 685.209(l)(3) states, "If the Secretary has received approval for disclosure of applicable tax information, but cannot obtain the borrower's tax information from the Internal Revenue Service, the borrower (and their spouse, if applicable) must provide documentation to the Secretary—(i) For the Income-Based Repayment plan, the borrower's income and family size; or (ii) For the Repayment Assistance Plan, the borrower's income and the number of		

		dependents." Again, is this the self-reported information provided by the borrower on the IDR request form, or would this use the number of dependents on the tax return (if applicable)? What would ED use in the event there was a discrepancy between the tax return/transcript and the self-reported responses in items 5 and 6? If the borrower is a non-tax filer, is the self-reported information used in the calculation? • Is there any scenario where the self-reported responses in items 5 and 6 would be used even when there was a successful transfer of FTI? • In the preamble discussion of the Reimagining and Improving Student Education-Federal Student Loan Program (RISE) final rule, the Department states, "To the extent that the borrower believes the information obtained from the IRS is inaccurate, our regulations at § 685.209(l)(6) permit a borrower to provide us with alternative documentation of income, or family size, or income and the number of dependents for the Repayment Assistance Plan. We will provide acceptable		

		documentation in sub-regulatory guidance so borrowers have a clear understanding of what they may utilize to furnish their application." While we understand the Department plans to provide additional information in sub-regulatory guidance regarding acceptable documentation, it is unclear when the self-reported responses to items 5 and 6 are factored into the calculation. We ask the Department to clearly detail the scenarios in which self-reported family size responses on the IDR request form are used in calculating monthly payment amounts.		
		Section 4B, Item 11 asks, "Has your income significantly decreased, or your marital status changed since you filed your last federal income tax return?" with the response option "No" instructing borrowers to "Provide your most recent federal income tax return or transcript and skip to Section 5A." Section 5A then provides borrowers with an opportunity to consent to the transfer of FTI from the IRS. If borrowers do not provide consent, the form instructs them to continue to Section 5B, which then asks borrowers to "provide your most recent federal tax return or tax transcript." This is not only duplicative, since the borrower was already instructed	The Department thanks you for your comment. For borrowers using the paper application, their consent to share tax information in Section 5A becomes effective upon being enrolled in the IDR plan, so the collection of their income documentation is necessary for the initial calculation of their monthly payment amount. However, by providing consent upon entry into the plan, the borrower will receive the benefit of autorecertification going forward. For this reason, we ask borrowers to submit their income information before they are provided the opportunity to provide consent as it would be necessary regardless of the answer provided. However, we agree that for borrowers who decline to provide consent, asking them to	Change

		to provide their tax return or transcript, but it is unclear why in Section 4B item 11, the borrower would be instructed to provide their most recent federal income tax return or transcript, if they give consent to transfer FTI from the IRS directly. If the reason for requesting the tax return/transcript is in case the transfer of FTI is unsuccessful, we suggest that providing the tax return/transcript upfront be optional. The form could explain that if FTI is not available, the borrower will be asked to provide a copy of their tax return/transcript, and give the option to provide a copy with the completed IDR request form. We suggest this same change be made to Section 4C, Item 14 as well.	provide their tax return or transcript again is duplicative and may be confusing, therefore we have revised the statement to act as a reminder that their most recent tax return or transcript is attached if they had previously been requested to provide it.	
		Additionally, while our comments are based on the paper/PDF version of the form, presumably many borrowers choose to complete the online version of the form. For the online version, if the borrower provides consent and the transfer of FTI is successful, the borrower should not be asked to provide a copy of their tax return/transcript, unless they are choosing to submit alternative documentation because their tax information is no longer reflective of their financial situation.	Thank you for your response. The sequence of questions for borrowers using the online application is different than when using the paper version of the form. Borrowers are asked to provide consent for sharing their tax information up-front and sharing can happen in real-time. If the transfer of information is successful, the borrowers are not prompted to provide their tax return or transcript unless they have experienced a change in their circumstances. No change.	No Change
		In Section 10, the definition of “Standard Repayment Plan” says, “The Standard Repayment Plan is only available to	Thank you for identifying this inconsistency. We have edited the form to consistently use the term “disbursed” when referencing when a loan is	Change

		borrowers with no loans received on or after July 1, 2026.” Elsewhere on the form, as well as in the description of the Tiered Standard Plan, the word “disbursed” is used instead of “received.” We ask that the Department consistently use the same terminology, and in this case consistently use the word “disbursed.” As stated earlier, we suggest adding a definition of the term “disbursed” within the repayment plan selection sections of the form, to ensure borrowers understand which repayment plan options are available to them. Additionally, the definition of “disbursed” should be included in Section 10 as well.	received.	
		We also suggest a statement be added to Section 10, instructing borrowers that if they wish to enroll in either the Standard Repayment Plan or the Tiered Standard Plan, they must complete the Fixed Payment Repayment Plan Request form instead of the IDR request form.	Thank you for your comments. Borrowers who have a combination of RAP eligible and RAP ineligible loans who select the RAP plan will not need to submit a separate form for their other loans. Instead, borrowers with no loans disbursed on or after July 1, 2026 will have those other loans remain in the fix payment repayment plan they are already in and borrowers with any loan disbursed on or after July 1, 2026 will have such loans automatically placed in the Tiered Standard Plan regardless of when they were disbursed. We have added language to this effect in the plan descriptions for both the Standard Plan and Tiered Standard plan in Section 10 of the form.	Change
		Also in Section 10, in the description of the Repayment Assistance Plan, we appreciate that a table is included showing the varying base payment percentages based	Thank you for your comment. The use of “Base Payment” as a heading on this table is consistent with the regulatory language at 685.209(b)(2) that introduces this concept and has been	No change

		on a borrower's adjusted gross income. We suggest changing the second column's header to state "Annual Base Payment" rather than "Base Payment." In the preceding paragraph, it says the percentage of annual income is divided by 12 for the monthly payment amount, but this could be even more clear to borrowers by changing the column header, ensuring borrowers do not think this base payment is the monthly payment amount.	included on other forms that did not receive similar public comments. In order to maintain consistency across our forms that use this term, we decline making this change at this time but will consider revising this language on all forms in the future if it is found to cause confusion.	
		The paragraph after the table describes the principal matching provision of the Repayment Assistance Plan. We acknowledge this is a very difficult scenario to explain in text, and therefore, we recommend that the form include an example illustrating how the principal matching provision operates with sample monthly payment amounts, in addition to the explanatory paragraph.	Thank you for your comment. The Department believes that the need for this example scenario is better addressed on www.StudentAid.gov. No change.	No Change