OMB Number 1845-0164 – PSLF Reconsideration
(60D) Comment Response Table

Comment #	Commenter Name	Comment	FSA Response	Change to ICR or Form
001	Francisco Franco	The reconsideration process should not be permanent. The Department is extending the program "without change," despite changes to federal student loan law under the One Big Beautiful Bill Act (OBBBA). Opponents could argue that the Department should first evaluate whether the reconsideration process is still necessary rather than automatically renewing it.	Thank you for your comment. The PSLF Reconsideration process was established through negotiated rulemaking and exists in regulation at 685.219(g). The department is obligated to administer a reconsideration process per the regulations.	No Change
		It encourages repeated administrative appeals. Critics could argue that borrowers already have opportunities to certify employment, review payment counts, and correct errors. An additional reconsideration process may: * Increase administrative costs. * Delay final resolution of cases. * Encourage repeated appeals even when decisions were correct.	The Department thanks you for your comment, but this is unrelated to the current information collection.	No Change
		Taxpayer burden Although the notice estimates only 9,000 annual burden hours for respondents, critics could point out that: * Government employees must review approximately 36,000 requests annually. * Those personnel costs ultimately fall on taxpayers. * Resources might be better directed toward preventing mistakes before denials occur instead of reviewing appeals afterward.	Thank you for your comment. The burden requirements of the Paperwork Reduction Act do not account for the burden to the government, including the hours for federal employee reviews. The burden calculated is to the public.	No Change

		Modernization should reduce the need The Department has invested heavily in electronic loan servicing and employment certification. Critics may argue that: * Better data sharing between employers, servicers, and the Department should eliminate many disputes. * Instead of extending reconsideration indefinitely, the Department should improve initial determinations.	Thank you for your comment. Efforts to modernize and streamline the PSLF and PSLF reconsideration process are always under consideration, but this is outside the scope of this collection.	No Change
		No evidence of effectiveness The notice does not provide: * Approval rates. * Processing times. * Error rates. * Whether reconsideration actually improves program accuracy. Without those metrics, opponents could argue there is insufficient justification to continue collecting this information unchanged.	Thank you for your comment, but this is outside the scope of this collection.	No Change
		Changes in federal law warrant a review. Although the notice states that OBBBA does not require changes to this form, opponents could argue that major statutory changes affecting Direct Loans should prompt a broader review of all related administrative processes, including reconsideration procedures.	Thank you for your comment. Federal statute review is outside the scope of this collection.	No Change
		Better alternatives exist Rather than relying on borrower-	Thank you for your comment. Efforts to modernize and streamline the PSLF and PSLF	No Change

		initiated reconsideration requests, the Department could: * Automatically audit denied applications. * Correct servicing errors proactively. * Notify borrowers of missing qualifying payments before denial. * Use data matching to identify eligible borrowers without requiring additional paperwork.	reconsideration process are always under consideration, but this is outside the scope of this collection.	
		I oppose extending this information collection without further evaluation. While the reconsideration process may have been appropriate when initially implemented, the Department has not demonstrated that continuing the collection unchanged remains necessary or efficient. The notice provides no data regarding approval rates, processing times, administrative costs, or whether reconsideration meaningfully improves the accuracy of Public Service Loan Forgiveness determinations. Given recent statutory changes affecting the Direct Loan program, the Department should review whether this process remains the best mechanism for resolving disputes. Resources would be better invested in improving the accuracy of initial eligibility determinations and proactively correcting servicing errors, reducing the need for borrowers to seek reconsideration after denial. Before	Thank you for your comments. The PSLF Reconsideration process is a requirement in current regulations at 685.219(g). The Department appreciates your recommendations for improving the process and will take them into account as the process is continually under review. However, the specific suggestions included in your comments are outside the scope of this information request and cannot be incorporated into the form.	No change

		extending this collection, the Department should publish evidence demonstrating its effectiveness and evaluate alternatives that reduce both borrower burden and taxpayer expense.		