

DEPARTMENT OF EDUCATION – JUSTIFICATION LETTER FOR EMERGENCY APPROVAL

DATE: June 12, 2026

TO: Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Office of Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education

FROM: Policy Implementation Division
Federal Student Aid (FSA)
U.S. Department of Education

SUBJECT: Request for emergency clearance no later than June 26, 2026, for a revision to an existing information collection, 1845-0110 Public Service Loan Forgiveness (PSLF) & Temporary Expanded PSLF (TEPSLF) Certification and Application form

Pursuant to the Office of Management and Budget (OMB) procedures established at 5 CFR Part 1320, the U.S. Department of Education (Department) requests that the information collection 1845-0110, Public Service Loan Forgiveness (PSLF) & Temporary Expanded PSLF (TEPSLF) Certification and Application form, be processed in accordance with 5 CFR 1320.13 Emergency Processing. The Department is actively preparing a full clearance package and plans to initiate the 60-day public comment period following the emergency approval.

The Department is requesting emergency clearance for 180 days to update the Public Service Loan Forgiveness (PSLF) & Temporary Expanded PSLF (TEPSLF) Certification and Application form to align with statutory changes made under the *One Big Beautiful Bill Act* (OBBBA) (P.L. 119-21) and [Final Regulations](#) published on October 31, 2025 (90 FR 48966), which are in effect as of July 1, 2026.

Information is Essential to the Mission of the Agency

Borrowers must complete this form to have their qualifying employment certified and their progress toward forgiveness recorded in our system. They are encouraged to submit this form annually but are only required to submit it at the point that they have reached the requisite 120 qualifying months of repayment. Final regulations for the William D. Ford Federal Direct Loan Program published on October 31, 2025, require changes be made to the language and instructions provided on the form.

Specifically, the information collected through the revised form will support borrowers' ability to apply and qualify for loan forgiveness benefits under the Federal Direct Loan program. Implementing the revised PSLF form by July 1, 2026 will allow the Department to meet its

statutory obligations and allow the employers of borrowers to attest to updated certification language that meets the new requirements under the statutory and regulatory provisions.

The Information is Needed Prior to the Expiration of Time Periods Established Under PRA

Both the October 31, 2025 final rules and the statutory text of the OBBBA require that certain provisions for borrowers who apply for the PSLF program be effective July 1, 2026. Without this emergency clearance, the Department would be unable to implement these changes to the PSLF application and certification form and inform borrowers of the new requirements under the mandated timeline.

Public Harm is Reasonably Likely to Result if Normal Clearance Procedures are Followed

Eligible borrowers must be able to apply for the benefits of the PSLF program, as established under the Higher Education Act of 1965, as amended (HEA). Absent this revised collection of information, the Department would not have sufficient or accurate information required to make eligibility determinations for these borrowers which may result in such borrowers being obligated to make unnecessary additional payments beyond the required 120 qualifying months of repayments. Additionally, as a requirement of applying for PSLF, borrowers and their employers must review and certify the eligibility requirements of the PSLF program prior to submission of the form. Currently, both the amendments to the HEA, made by the OBBBA, and the October 31, 2025 final rules that are effective July 1, 2026 are not reflected in the PSLF form, so the Department must make and expedite those form changes so that borrowers and their employees may comply with the new requirements.

An Unanticipated Event Has Occurred

The Department continues to face unanticipated challenges that fundamentally change the eligibility criteria for borrowers who seek to enroll in PSLF. Recent revisions to the law, including OBBBA, and rulemaking activities impacted the final requirements for borrowers to qualify and apply for the PSLF program. Together, the timing of these legislative activities and additional requirements have resulted in the Department being unable to make changes to the PSLF form earlier and informing borrowers of new eligibility requirements.

Conclusion

Following the normal clearance procedures for this information collection will delay the ability of the Department to provide an updated form that is compliant with all statutory and regulatory requirements that are effective July 1, 2026.

Following normal clearance procedures will also negatively impact the Department's ability to best support borrowers with required and up-to-date repayment options. We believe it is critical to provide a compliant form to borrowers so that they are not delayed in applying for the loan forgiveness benefits for which they are eligible.

Thank you for your consideration.