Memorandum

United States Department of Education
Office of the Chief Data Officer

DATE: August 10, 2026

TO: Phillip Pollman, OMB
Shagufta Ahmed, OMB

FROM: Ross Santy, ED/OPEPD/OCDO ROSS SANTY Digitally signed by ROSS SANTY Date: 2026.08.10 14:04:17 -04'00'

SUBJECT: Nonsubstantive change request to address technical corrections needed in FSA's DL Promissory Notes and related forms collection (1845-0007)

FSA has identified 2 corrections that need to be made to the Direct Consolidation Loan Application and Promissory Note within 1845-0007. New text needing to be added is shown here in red:

1) On page 9 of the 30D_Direct Consol Loan App and Prom Note_1845-0007_OMB.docx Instrument File:

> Items 20 through 23 in this section ask for information about your education loans that you do not want to consolidate. You may want to exclude certain loans from your consolidation because a Direct Consolidation Loan could be limited to only the Tiered Standard Plan if it includes certain loan types (see Section 11 Item 10) and FFELP loans being consolidated could lose access to certain plans.

2) On page 24 of the 30D_Direct Consol Loan App and Prom Note_1845-0007_OMB.docx Instrument File:

> Following the recent 30-day comment period a conflict was identified between the Direct Consolidation Loan Application and Promissory Note and the Loan Verification Certificate (LVC). The instructions for the LVC were updated to always use the statutory interest rate for calculating the weighted average interest rate of a consolidation loan but the corresponding explanation of this change on the Direct Consolidation Loan Application and Promissory Note was not made when discussing how this impacts borrowers who qualify for the Servicemembers Civil Relief Act provision which may cap their interest rate below the statutory rate. We have updated the form to insert a single word to clarify: "...the 6% interest rate will not be used to determine..."