Jun 6, 2025

U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue SW, 5th Floor
Washington, DC 20202

Docket ID: ED-2025-SCC-0015

To whom it may concern:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education our comments on the Department's emergency request for review and concurrent public comment period regarding the revision of the Income-Driven Repayment (IDR) Plan Request form (Docket ID ED-2025-SCC-0015).

NASFAA represents nearly 29,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every 10 undergraduates across the country.

Support for Income-Driven Repayment Plans
NASFAA strongly supports the principle and availability of income-driven repayment plans (IDR), recognizing them as an essential component of the federal student loan system. IDR plans provide a critical safety net, ensuring repayment obligations remain manageable for borrowers facing financial hardship, job loss, illness, or other unanticipated life events that can impede their ability to meet standard repayment schedules. This support is vital for borrowers who take their repayment obligations seriously but cannot afford them. 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.

Repayment plans that offer manageable monthly payments based on income and family size, and a reasonable repayment term after which remaining loan balances are forgiven, provide borrowers with essential protection against overwhelming debt and default. Time-based forgiveness is a crucial element of any IDR plan as it saves borrowers from a lifetime of debt.

Concerns Regarding Form Availability, Timeliness, and Borrower Confusion
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. While we understand developing and clearing forms takes time, this month-long gap left borrowers and the institutions and servicers assisting them in a state of limbo, faced with outdated or no information, potentially leading to delays in processing critical repayment plan requests that may have resulted in borrowers facing unaffordable payments, accruing unnecessary interest, or being placed in less advantageous statuses. Swift action and clear communication are paramount during such disruptions. As the SAVE plan litigation continues, 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.

Necessity of the Collection
Given the court injunction, NASFAA acknowledges the necessity of revising the IDR application to comply with the current legal requirements as ED understands them. Given ED's interpretation, removing the SAVE plan option and reverting definitions like "family size" are unavoidable steps under the circumstances.

However, the need for this revision underscores the significant disruption and uncertainty imposed on borrowers by the legal challenges. While ED deemed this interim form necessary from a compliance standpoint, it highlights the instability borrowers face.

Ways to Improve the Form's Quality, Clarity, and Utility
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.

Specific Form Changes
We note the following specific changes implemented in the interim form:

> **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.
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> **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 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.
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> **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.

Conclusion
NASFAA strongly supports the principles of income-driven repayment as an essential safety net. However, the current environment, marked by legal challenges, delays in form availability, and shifting rules, places an undue burden of confusion and uncertainty on borrowers. We urge the Department to prioritize clarity, transparency, and proactive communication in the interim IDR Request form and all related outreach. Furthermore, to prevent future occurrences of such instability, we implore the Department to develop robust contingency plans for various legal outcomes, ensuring that borrowers are not repeatedly subjected to these periods of uncertainty, risk, and form unavailability.

We appreciate the opportunity to comment on the Department's public comment period on the IDR request form. If you have any questions regarding these comments, please contact us or NASFAA's Senior Policy Analyst, Megan Walter.

Regards,

Melanie E Storey

Melanie Storey
President and CEO, NASFAA