



June 22, 2026

Docket ID ED-2026-SCC-1420

Carolyn Rose
U.S. Department of Education
Federal Student Aid
400 Maryland Avenue SW
Washington, DC 20202

Dear Ms. Rose,

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 (ED) our comments on its revisions to the Income-Driven Repayment Plan Request (Docket ID ED-2026-SCC-1420).

NASFAA represents more than 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 in the U.S.

We appreciate the opportunity to provide feedback on proposed revisions to the Income-Driven Repayment (IDR) request form, which borrowers use to enroll in or change IDR plans and to submit annual recertification information. NASFAA recognizes that updates to the IDR request form are necessary to implement the changes enacted under the One Big Beautiful Bill Act (OBBBA). We appreciate the Department's work to revise the form and update it to reflect recent statutory changes, including the addition of the Repayment Assistance Plan. However, we believe there are opportunities to strengthen the form to ensure it is as clear, accurate, and user-friendly as possible for borrowers navigating the repayment process.

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.

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 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.

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 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(1)(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(1)(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(1)(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 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.

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.

In Section 10, the definition of “Standard Repayment Plan” says, “The Standard Repayment Plan is only available to 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.

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.

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 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.

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.

We appreciate the Department’s revisions to the IDR request form to incorporate the Repayment Assistance Plan option and align with the statutory changes established under the One Big Beautiful Bill Act. We hope our recommendations outlined above will be considered in order to further strengthen borrower understanding and improve the overall user experience.

We thank you for the opportunity to comment on the Department’s public comment period regarding its revisions to the IDR request form. If you have any questions regarding these comments, please [contact us](#) or NASFAA’s policy analyst, Sarah Austin at austins@nasfaa.org.

Regards,

A handwritten signature in black ink that reads "Melanie E Storey". The signature is written in a cursive, flowing style.

Melanie Storey
President and CEO, NASFAA