



June 16, 2026

Docket ID ED-2026-SCC-1387

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 William D. Ford Federal Direct Loan Program Repayment Plan Selection Form (Docket ID ED-2026-SCC-1387).

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 revisions made to the repayment plan selection form for borrowers selecting a fixed payment repayment plan. NASFAA recognizes that updates to the repayment plan selection form are necessary to implement the changes enacted under the One Big Beautiful Bill Act (OBBBA). Overall, we appreciate the Department's efforts to revise the form and align it with the new statutory framework, and we are encouraged by several of the proposed changes that improve clarity and better reflect borrowers' repayment options. However, we believe there are opportunities to further strengthen the form to ensure it is as clear, accurate, and user-friendly as possible for borrowers.

NASFAA supports renaming the form as the "Fixed Payment Repayment Plan Request" rather than listing all the repayment plan options as part of the form name. We also support adding the statement, "You never need to pay for help with your federal student loans. Your loan servicer will help you for FREE. Contact your servicer if you have questions about this form or need any information regarding your federal student loans." Highlighting that borrowers do not need to pay in order to get help with loan repayment is a welcome addition to the form's information.

We also support breaking Section 2 into two distinct sections (2A and 2B) based on whether a borrower has taken out loans on or after July 1, 2026, as the repayment plan options greatly differ

between these two categories of borrowers. Because of this critical distinction, we recommend adding a brief explanatory statement to both sections defining “disbursed” so borrowers can easily determine which section of the form applies to them. Without additional clarification, some borrowers may not understand that “disbursed” refers to the date loan funds were paid out, which could create confusion when identifying which section to complete.

Additionally, we suggest adding to Section 2A, before question 1, a statement that says, “If you had a loan disbursed on or after July 1, 2026, skip Section 2A and proceed to Section 2B.” While this section states it is for borrowers “with ONLY loans disbursed before July 1, 2026,” we believe an additional statement explaining when 2A can be skipped would help ensure borrowers with loans borrowed on or after July 1, 2026, understand they can skip all questions and information until Section 2B. Similarly, in Section 2B, we suggest adding a statement before question 1 that says, “If you did not have a loan disbursed on or after July 1, 2026, do not complete Section 2B. Instead, go back and complete Section 2A.”

The table in Section 2B is confusing and needs revisions to ensure borrowers understand which repayment plans are available to them. Rather than trying to describe all types of loans, some of which could seemingly fall into multiple categories of the table, we instead suggest creating a table similar to the one used in section 2A, listing only loans that are ineligible for Income-Driven Repayment (IDR) plans. As part of the paragraph before the table in 2B, we suggest adding a statement that says, “If you have a loan disbursed on or after July 1, 2026, the only potential repayment plan options you may be eligible for are the Tiered Standard Plan and the Repayment Assistance Plan. However, the following loan types are not eligible for the Repayment Assistance Plan, and therefore, must be repaid under the Tiered Standard Plan.” Then, the table could include the types of loans ineligible for the Repayment Assistance Plan, such as but not limited to Direct Parent PLUS Loans and Direct Consolidation Loans that repaid a Direct Parent PLUS Loan.

In both 2A and 2B, NASFAA agrees with providing information on how to apply for IDR plans and suggesting borrowers use the repayment calculator to estimate their monthly payments for all plans for which they are eligible. We assume the repayment calculator is a renaming or replacement of the Loan Simulator tool. If so, we encourage the Department to provide a clear and timely announcement, given that many organizations reference the tool in consumer-facing resources and communications.

In Section 3, there is a new bullet that states, “If I have a new loan disbursed on or after July 1, 2026 but did not complete Section 2B or incorrectly completed Section 2A, I request that my loan holder treat my request as if I had selected Item 1 in Section 2B which requires that all my Direct Loans be placed in the Tiered Standard Plan.” We acknowledge that there will likely be borrowers in this situation, and this statement is therefore necessary, but suggest adding a sentence to this bullet stating, “If I later want to change my repayment plan selection for loans that are eligible for the

Repayment Assistance Plan, I understand that I will need to complete the IDR Request Form to make that change.”

In Section 5A, there is a statement that says, “For all loan types, the maximum repayment period is 25 years” which is presumably part of the description for the Extended Repayment Plan, as earlier in the descriptions for the Standard and Graduated plans, it says, “For Direct Consolidation Loans disbursed before July 1, 2026, the maximum repayment period ranges from 10 to 30 years, depending on loan debt.” However, this should be more clear. If the maximum repayment length for the Extended Repayment Plan is 25 years, even for Direct Consolidation Loans disbursed before July 1, 2026, that should be clearly stated. We suggest the last sentence of the Extended Repayment Plan description instead say, “Under the Extended Repayment Plan, the maximum repayment period is 25 years for all loan types (including Direct Consolidation Loans disbursed before July 1, 2026).”

Section 5B is for “Fixed Payment Repayment Plan Descriptions for borrowers with any loan disbursed on or after July 1, 2026,” but the words “Repayment Assistance Plan” appear after the description of the Tiered Standard Plan. It seems this is extraneous text that should not be included in this section. We recommend that the Department remove the words “Repayment Assistance Plan” from this section.

Overall, we are pleased with the Department’s proposed revisions to the Repayment Plan Selection Form and appreciate the effort to align the form with the statutory changes under the OBBBA. We hope the Department will give careful consideration to the recommendations outlined above, which are intended to further enhance the form’s clarity, usability, and effectiveness for borrowers.

We appreciate the opportunity to comment on the Department’s public comment period regarding its Repayment Plan Selection 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