

Clarifying payment plan availability for FFEL borrowers who take out new loans (Submitted by Tamar Hoffman and Ashely Naporlee)

Good afternoon,

Thank you to again to the whole team at the Department for working hard to carefully consider our proposals. During the last week of negotiations, ED graciously clarified that FFEL borrowers who take on new loans post-July 1, 2026 will retain their access to IBR since FFEL loans are not eligible for RAP. We foresee this being a very important issue for borrowers in the years to come. To that end, we are writing to request that ED include regulatory language that reflects that FFEL borrowers who take on new loans after July 2026 will still retain access to IBR. If that is not possible from ED's perspective, then we would like to request that this clarity be provided in writing in the preamble. Thanks for your consideration and looking forward to hearing from you.

Thanks,

Tamar

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