

Questions on IDR 682.215 685.209 and Fixed Repayment 685.208 Submitted by Emeka Oguh

IDR 682.215 685.209

Pg. 17: (2) Through June 30, 2028, a Direct Loan borrower who has not received a Direct Loan on or after July 1, 2026, may repay under the REPAYE plan if the borrower has loans eligible for repayment under the plan;

Since the REPAYE plan was transitioned into the SAVE plan in 2023, is there consideration to maintain payments under SAVE through June 30, 2028? If not, which program should be referenced in place of REPAYE/SAVE for this period?

Fixed Repayment 685.208

Under current rules, only the 10-year Standard plan qualifies for PSLF among fixed repayment options. Borrowers who mistakenly enroll in other fixed plans must rely on TEPSLF, which was created as a temporary stopgap in 2018 and funded through annual appropriations.

From a fiscal and administrative perspective, will TEPSLF remain funded and available to handle these cases, or will borrowers who enter new fixed repayment plans create ongoing disputes, appeals, and servicing errors that drive up taxpayer costs once TEPSLF sunsets?

What steps will the Department take to proactively reduce administrative overhead — for example, by auto-directing PSLF-eligible borrowers into qualifying repayment plans or requiring clear disclosure of PSLF eligibility status before borrowers can enroll in a non-qualifying fixed plan?