1. **Q: Consolidation applications submitted by 9/29/2022 but not yet fully processed?  Are they eligible for debt relief?**

A: No, if the application was not completed by 9/29/2022 it is not eligible however this is very fluid and can change.

1. **Q: Is there a way for FFEL commercially held loans to consolidate into Direct Consolidated loan without losing payment time toward forgiveness on an IDR forgiveness plan?**

A: If your goal is to have your FFEL loans eligible for the current debt relief, you have missed that deadline, which was 9/29/2022. If your goal to consolidate your FFEL loans now, is to prepare for future debt relief, please keep in mind, once you consolidate, it becomes a new loan and the payment time towards the IDR loan forgiveness resets to zero.

1. **Q: Fresh Start: Are defaulted federal parent PLUS loans eligible?**

A: We believe defaulted Parent PLUS loans are eligible for Fresh Start based on the “Which loans are eligible” chart on the following page: <https://studentaid.gov/announcements-events/default-fresh-start> and Parent borrowers should contact their loan holder to confirm eligibility.

Also, per NASFAA:

*Q: Are Parent PLUS Borrowers Eligible for Fresh Start?*

*A: Yes. The U. S. Department of Education (ED) has informed NASFAA that parent PLUS borrowers are eligible for Fresh Start. The parent borrower will need to contact their current loan servicer to let them know they want to take advantage of the Fresh Start Initiative. At this time ED does not know how entering Fresh Start will affect a parent borrower's future credit check. ED also states that a parent borrower is not required to pursue Fresh Start and may continue to request that the school deny a request for PLUS based on the parent's unusual circumstances.*

1. **Q: If a parent who had loans and received a Fresh Start letter regarding their loan default and they are appealing a plus loan denial, is the student's school responsible to process the direct plus loan or is applicant services from DOE supposed to process their direct plus loan reversal. Where do they need to send the letters to their institution or the loan servicer?**

A: As mentioned several times during the webinar, the Fresh Start letter from Default Resolution Group (DRG) hold NO VALUE. In this case, it has value in proving that the loan(s) is in default. Appealing a PLUS Loan denial, due to default, has nothing to do with Fresh Start and is not possible. The borrower must be processed for Fresh Start, then the default will no longer be in place making an appeal unnecessary. However, a PLUS loan borrower cannot be taken out of default until a disbursement has been made, so it’s a catch 22. In summary, we do not have an absolute answer, therefore it is our recommendation to contact COD for further guidance. As Fresh Start is very fluid and ever changing, if we learn of the answer, we will share it.