Total & Permanent Disability (TPD) Discharge

Screening clients, gathering documentation, and filing — including how to act as a client's Designated Representative

Under the TPD Discharge program, a borrower who cannot work because of a physical or mental impairment may have **all** of their federal student loans (and any TEACH Grant service obligation) canceled — regardless of whether they are current on payments. Many borrowers are discharged automatically through data-matching with the Social Security Administration (SSA) or the Department of Veterans Affairs (VA). This guide focuses on **helping clients who are not automatically identified** file their own application, and on how you can serve as their representative throughout the process.

Three Pathways to Eligibility — What Documentation Each One Needs

Veteran's Disability

The simplest path for veterans: a service-connected disability rating of 100%, or a rating indicating the veteran is unemployable due to a service-connected condition, automatically qualifies.

Documents needed: VA disability rating/determination letter showing 100% service-connected disability (or individual unemployability). Many veterans are matched automatically — check StudentAid.gov account first.

Social Security

Qualifies if the borrower's SSDI medical review is 5–7 years out; is in the 3-year review category and has been renewed once; has a disability onset date 5+ years before first receiving benefits; qualifies for SSA's Compassionate Allowance program; or moved from SSDI to retirement benefits after meeting one of these.

Documents needed: Social Security Benefit Planning Query (BPQY) letter showing the review-period category, or other SSA award/review documentation. These review categories can be hard to prove — the medical professional pathway is often easier even for SSDI recipients.

Medical Professional Certification

Usually the most accessible route. A qualifying provider certifies the client cannot engage in *any substantial gainful work activity* due to an impairment that (a) is expected to result in death, (b) has lasted 60 months (5 yrs), or (c) is expected to last 60 months.

Documents needed: Section 4 of the TPD application, completed and signed by a physician (MD/DO), nurse practitioner, physician assistant, or licensed psychologist — legible, with title and a brief description of the disabling limitation.

Quick Client Screen — ask any borrower with federal loans (including Parent PLUS):

- Unable to work due to an ongoing disability or condition?
- Receiving VA, SSI, or Social Security disability benefits?
- Retired and unable to return to work due to a condition?

Acting as a Designated Representative

A borrower who needs help can authorize an attorney, family member, or other advocate to manage the entire TPD process on their behalf — submitting the application, corresponding with the servicer, and receiving status updates.

- **Form:** the borrower must complete and sign the *Applicant Representative Designation: Total and Permanent Disability* (ARD) form — available as a downloadable PDF at StudentAid.gov or through the online TPD application.
- **Submission:** upload the signed ARD alongside the application through the Document Upload Tool, or mail/fax it with the paper application.
- **Processing first:** the ARD must be received and processed by the Department before the representative can access the borrower's account or discuss the case by phone.
- **Verifying identity:** when calling on a client's behalf, be ready to provide the representative's own identifying information, plus the borrower's name, SSN, and date of birth.
- **Revocation:** the borrower may revoke the designation at any time; a new ARD is needed to change representatives.

Practice tip: Some attorneys have reported difficulty getting full account access even with a signed ARD on file, particularly as the Department tightens account security. Follow up if a representative isn't recognized by phone support, and consider a short cover letter explaining the ARD when submitting by mail or fax.

Filing the Application

1. Contact the loan holder/servicer *before* filing — this can pause required payments for up to 120 days while the application is prepared.
2. Apply online at **studentaid.gov/tpd-discharge** (fastest processing) or complete the paper application.
3. Select the eligibility pathway and upload supporting documentation (VA letter, BPQY, or medical certification).
4. For medical certification: provide the provider's email to send them a secure e-sign link, or print the form for a wet signature.
5. Submit the signed ARD (if applicable) with the application.
6. Paper filings go to Nelnet, the Department's TPD servicer (address below) — by mail, fax, or online upload.

After discharge — watch for this: There is no longer a post-discharge income-monitoring period. But if the borrower takes out **any new federal loan — including a Parent PLUS loan for a child — within 3 years** of discharge, the discharged debt can be reinstated. Counsel clients accordingly before they or a family member borrow again. If denied, clients can reapply with stronger documentation or request review through the FSA Ombudsman.

TPD SERVICER (NELNET) — PAPER FILINGS
U.S. Dept. of Education, TPD, P.O. Box 300010, Greenville, TX 75403 | Fax: (540) 212-2415

BORROWER / REPRESENTATIVE SUPPORT
FSA Info Center: (888) 303-7818 | studentaid.gov/tpd-discharge | Live chat for TDD/TTY

ATTORNEY CASE CONSULTATION
NCLER: ConsultNCLER@acl.hhs.gov | NCLC SLBA: studentloanborrowerassistance.org

Sources: NCLC/NCLER TPD Tip Sheet (Nov. 2024); Federal Student Aid, studentaid.gov/tpd-discharge; NCLC Student Loan Borrower Assistance Project. For general information only — not a substitute for individualized legal advice.