

# MOHELA Return to Repayment Communications Playbook

V14 – 10/11/2023

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## Introduction

- This plan is preliminary and will be refined as we receive more information and guidance from FSA. An understanding of FSA’s Playbook and key messages will be leveraged to ensure clear and consistent communications for our customers. Our supplemental communications are being planned to reinforce FSA’s outreach, with specific calls to action for borrowers to get to tools that MOHELA offers for borrowers to self-serve.
- Costs and resources may affect the timing and execution methods of outreach that is not required or funded by FSA.
- If MOHELA experiences an influx of servicing volume resulting from outreach to borrowers, it may impact our ability to send some or all communications that we anticipate are not required to send.
- MOHELA will be transitioning servicing systems during this time period, which may impact our communications plan.
- As MOHELA contact center representatives are available, we may leverage outbound dialing campaigns to get updated contact information for borrowers that will allow us to more effectively communicate with borrowers upon return to repayment.
- Items noted in gray have been completed.

## Overarching Communications Approach

- FSA has provided a Communications Playbook for its plans to perform a variety of highly targeted and comprehensive communications. In coordination with the timing of FSA’s outreach to customers, MOHELA plans to perform required communications and will be creating additional outreach to customers we service to supplement what FSA is sending.
- MOHELA will use deflection messaging as provided in the FSA Playbook. Additional deflection messaging will be created based on inquiries and needs. Details are included in this Playbook, and these communications will be provided to FSA for review and approval.
- MOHELA plans to utilize the following communications channels:

Channel	Approach
Email	Campaigns are our number one way that communications will be sent for return to repayment. Approximately 95% of customers have a valid email address.
Outbound Dialing	When available, customer service representatives may make outbound calls to customers.
Direct Mail	In required printed communications to customers, we may incorporate messaging and enclosures to promote key return to repayment themes.
Social Media	Social media is not one of our top communication methods to reach customers, however we will be resharing FSA content with our customers who follow us.
Outbound Texting	We do not plan to use outbound texting due to regulatory constraints.

## Outreach Volume

Campaign Month	Campaign Channel	Campaign Title	Estimated Volume	Actual Volume (once available)
July	Email	Update Contact Information	3M borrowers	3,711,096
August	Email	Role of a Servicer and Actions to Prepare for Repayment	6M borrowers	5,748,225
September-October	Email	Payment Reminders	6M	
September-October	Bills/Auto Debit letters	Payment Notifications (Callout to promote lower payment options)	6M	

## Outreach related to ACH/Auto Debit

Title 1	Outreach to all borrowers based upon their ACH status (CR5881)
Audience 1	All borrowers who are on ACH, but by sign up status (CR5881)
Description 1	Outreach to encourage borrowers to reconfirm their auto-debit and, at the direction of FSA
Expected Date for Finalized Content	Previously provided
Start Date	Unenrollment can begin on August 22, 2023, using the previously approved communication that each servicer provided for FSA to review. MOHELA received approval for its communications and plans to unenroll borrowers between 8/22/2023 and 8/28/2023, as instructed by FSA.  Unenrollment communications will be completed before a borrower receives their billing statement.
End Date	All communications completed except the unenrollment notification – Unenrollment for Cohort 1 began 8/28/2023
Method	As defined in CR 5881
Status	Completed

## May 2023

Title 1	Paperless Promotion
Audience 1	Borrowers not on paperless
CTA	Log in to go paperless
Expected Date for Finalized Content	4/28/2023
Start Date	5/5/2023-5/16/2023

End Date	<del>5/26/2023</del> 6/12/2023
Method	Email
Success Metrics	Paperless enrollment by <del>6/9/2023</del> 6/26/2023 Increased paperless enrollments by 92,674 borrowers
Status	Completed

Title 2	Paperless Promotion
Audience 2	Borrowers who call our DL or PSLF phone lines
Expected Date for Finalized Content	5/12/2023
Start Date	6/9/2023
End Date	To be determined
Method	IVR Messaging and Phone In Queue Messaging: Update to promote paperless
Status	Completed

Title 3	Paperless Promotion
Audience 3	Borrowers who log into mohela.com
Expected Date for Finalized Content	5/12/2023
Start Date	6/9/2023
End Date	To be determined
Method	Website Functionality: Increase the frequency for the paperless nags on the web to every 30 days
Status	Completed

## June 2023

Title 1	Update Contact Information
Audience 1	Borrowers with a valid email but are missing any of the following contact types: <ul style="list-style-type: none"> <li>• valid phone number, OR</li> <li>• valid address, OR</li> <li>• mobile consent</li> </ul> Exclusions: In School Status, Borrowers with demographic updates after 1/1/2023
CTA	<ul style="list-style-type: none"> <li>• Update contact information</li> <li>• Promote Paperless</li> <li>• Promote creating a web account on mohela.com</li> <li>• Promoting auto debit (for borrowers who are not enrolled)</li> <li>• Reviewing the borrower's monthly payment amount to make sure they are prepared for their October bill</li> </ul>
Start Date	5/8/2023

End Date	7/3/2023
Method	Outbound Phone Calls
Status	Completed

Title 2	Actions to prepare
Audience 2	Borrowers who call our DL or PSLF phone lines or visit mohela.com
CTA	<ul style="list-style-type: none"> <li>• Update contact info</li> <li>• Apply for Auto Debit</li> <li>• Apply for IDR</li> </ul>
Expected Date for Finalized Content	5/12/2023
Start Date	June 2023
End Date	To be determined
Method	IVR Messaging and Phone In Queue Messaging/Web Messaging to promote easy access to items listed above
Status	Completed

Title 3	Return to Repayment Date Confirmation
Description 3	<p>MOHELA put the following banner on our website and IVR.</p> <p><b>Website/IVR:</b> Congress recently passed a law preventing further extensions of the payment pause. Student loan interest will resume starting on September 1, 2023, and payments will be due starting in October.</p> <p>Borrowers will receive a billing statement from their loan servicer at least three weeks before their payment is due.</p>
Audience 3	All borrowers
Expected Date for Finalized Content	Already provided by FSA
Start Date	As directed by FSA
End Date	Servicers may continue as they see fit in concert with future deflection phases and their own deflection needs.
Method	Website Banner and IVR Updates
Status	Completed

## July 2023

Title 1	Return to Repayment Resources are available
Audience	All borrowers on mohela.com
Draft for FSA Review	Proposed draft provided to FSA on July 11, 2023
Start Date	7/24
End Date	8/3
Method	Web banner

Status	Completed
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Title 2	Update Contact Information
Audience 2	<p>Borrowers with a valid email but are missing any of the following contact types:</p> <ul style="list-style-type: none"> <li>• valid phone number, OR</li> <li>• valid address, OR</li> <li>• mobile consent</li> </ul> <p>Exclusions: In School Status, Borrowers with demographic updates after 1/1/2023</p>
CTA	<ul style="list-style-type: none"> <li>• Log in to review and update your contact information.</li> </ul>
Expected Date for Finalized Content	<p>Draft for FSA provided 7/13/2023 FSA approved 7/24/2023</p>
Start Date	7/24/2023
End Date	8/3/2023
Method	Email
Success Metrics	<p>Changes to personal demographics by 8/17/2023 Sent to 794,469 borrowers Open rate = 59.7%</p>
Status	Completed

Title 3	MOHELA Call Center Deflection Messaging Phase 1
Description 3	Additional deflection messaging will be created by MOHELA based on inquiries and needs.
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Deflection Messages	<p>Income-Driven Repayment Account Adjustment</p> <p><b>Update: If you received an email from Federal Student Aid regarding income-driven repayment (IDR) forgiveness and you would like to opt out of this forgiveness, please contact us by August 11, 2023. If you did not receive the email from Federal Student Aid, then you have not been identified for forgiveness at this time. Our customer service representatives do not have any further forgiveness information to provide at this time.</b></p> <p>In April 2022, the U.S. Department of Education announced several updates that will bring borrowers closer to forgiveness under income-driven repayment (IDR) plans. Based on the newly eligible months from the one-time account adjustment, borrowers who have reached 240 or 300 months (as</p>

	applicable) worth of payments for IDR forgiveness or 120 months of PSLF will begin to see their loans forgiven in spring 2023. The Department will continue to discharge loans as borrowers reach the months needed for forgiveness. All other borrowers will see their accounts update in 2024.  For more information, please visit <a href="https://mohela.com/IDRAccountAdjustment">Mohela.com/IDRAccountAdjustment</a> .
Start Date	July 14, 2023
End Date	To be determined
Method	Website
Status	Ongoing

Title 4	Return to Repayment: SAVE and On-Ramp
Description 4	Messaging about the new SAVE plan and on-ramp program
Audience	All non-default borrowers
Expected Date for Finalized Content	7/14/2023
Start Date	7/14/2023
End Date	To be determined
Method	IVR
Status	Completed

Title 5	Social Media Posts announcing SAVE
Description 5	Resharing FSA social media posts announcing SAVE
Audience	All non-default borrowers
Expected Date for Finalized Content	N/A
Start Date	7/14/2023
End Date	To be determined
Method	Social media
Status	Completed

## COMMUNICATION PAUSE FOR NEW IDR FLOW LAUNCH

FSA instituted a communication pause related to IDR beginning at the end of the email send on July 24, 2023. As part of this pause FSA paused/stopped communications directing borrowers to the IDR flow on [studentaid.gov](https://studentaid.gov). This communication pause ended on August 22, 2023. As part of this pause loan servicers were asked by FSA to pause/stop communications directing borrowers to the IDR flow on [studentaid.gov](https://studentaid.gov).



## August 2023

Title 1	Role of a Servicer and Actions to Prepare for Repayment
Audience 1	KM region borrowers who will have payments due between 10/1/2023-11/30/2023  Exclusions: In School Status, Deferments or forbearances will end dates on/after 12/1/2023
CTA	Additional reminder reinforcing the need for preparing borrowers for disclosures, billing statements, and to start making payments soon. Also encourage to sign up for auto-debit and for IDR (SAVE). Also promote paperless.
Expected Date for Finalized Content	8/25/2023
Start Date	08/25/2023
End Date	09/05/2023
Method	Email
Borrower Count	5,748,225
Success Metrics	Email clicks
Status	Completed

Title 2	MOHELA Call Center Deflection Messaging Phase 2 – General R2R
Description 2	Nag screen to promote IDR plans
Audience	All non-default borrowers
Expected Date for Finalized Content	8/24/2023
Deflection Messages	
Start Date	8/24/2023
End Date	TBD
Method	Web
Status	Completed

Title 3	MOHELA Call Center Deflection Messaging Phase 2 - SAVE
Description 3	MOHELA will post messaging to promote self-service and the use of resources such as StudentAid.gov to prepare.
Audience	All non-default borrowers
Expected Date for Finalized Content	TBD
Deflection Messages	
Start Date	8/29/2023
End Date	To be determined
Method	Website
Status	Completed

Title 4	General R2R Information
Description 4	MOHELA will post messaging to borrowers to promote self-service, and using resources such as StudentAid.gov to prepare.
Audience	All non-default borrowers
Expected Date for Finalized Content	08/28/23
Deflection Messages	To be determined
Start Date	8/31/23 tentative
End Date	Ongoing
Method	Social Media
Status	Completed

Title 5	Call Center Deflection Messaging Phase 2 – Auto Pay
Description 5	MOHELA messaging to advise borrowers auto pay can only be set up online.
Audience	All non-default borrowers
Expected Date for Finalized Content	Week of August 14 <sup>th</sup>
Deflection Messages	<p>Student loan interest will resume starting on Sept. 1, 2023, and payments will be due starting in October. We will send a billing statement at least three weeks before payment is due.</p> <p>If you are unsure if you can afford your student loan payments, we encourage you to visit Federal Student Aid's <a href="#">Loan Simulator</a>. There you can find the repayment plan that is best for you, including an income-driven repayment plan. Once you complete the loan simulator you can immediately apply for IDR at <a href="#">StudentAid.gov/IDR</a>.</p>
Start Date	08/18/2023
End Date	TBD
Method	Web
Status	Completed

<del>Title 6</del>	<del>Call Center Deflection Messaging Phase 2</del>
<del>Description 6</del>	<del>MOHELA messaging to advise borrowers auto pay can only be set up online.</del>
<del>Audience</del>	<del>All non-default borrowers</del>
<del>Expected Date for Finalized Content</del>	<del>08/14/2023 (tentative)</del>
<del>Deflection Messages</del>	<del>Log in to Mohela.com to sign up for auto pay. Our customer service agents are unable to process requests over the phone at this time. Logging into your account also allows you to easily update your contact information, or change your current autopay setup. If you do not have</del>

	an account set up yet, it is fast and easy. Visit <a href="http://Mohela.com">Mohela.com</a> and select Register at the top of the page.
Start Date	TBD
End Date	TBD
Method	IVR
Status	MOHELA drafting Cancelled this activity due to the timing of new messaging

Title 7	MOHELA Call Center Deflection Messaging Phase 2
Description 7	PSLF and TEPSLF Payment Pause message
Audience	All non-default borrowers
Expected Date for Finalized Content	08/22/2023
Start Date	08/23/2023
End Date	TBD
Method	IVR
Status	Implemented

Title 8	MOHELA Call Center Deflection Messaging Phase 2
Description 8	IDR D2D Web Banner
Audience	All non-default borrowers
Expected Date for Finalized Content	8/14/2023
Start Date	8/14/2023
End Date	TBD
Method	Web
Status	Implemented

Title 9	MOHELA Call Center Deflection Messaging Phase 2
Description 9	IDR account adjustment
Audience	All non-default borrowers
Expected Date for Finalized Content	08/11/2023
Start Date	08/15/2023
End Date	TBD
Method	Web
Status	Implemented

Title 10	MOHELA Call Center – R2R Outbound Call Campaign
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Description 10	Outbound call campaign
Audience	All non-default borrowers without a valid email address or mobile consent
Expected Date for Finalized Content	8/28/2023
Start Date	8/29/2023 (outbound calls will be performed, as staff is available)
End Date	TBD
Method	Outbound Calling
Status	FSA Approved

Title 11	MOHELA Call Center Deflection Messaging Phase 2
Description 11	PSLF and TEPSLF Payment Pause message
Audience	All non-default borrowers
Expected Date for Finalized Content	8/28/2023
Start Date	8/29/2023
End Date	TBD
Method	Web
Status	Implemented

Title 12	MOHELA Disclosure – Promotional Content
Description 12	Adding a designed promotion to the disclosure to promote IDR, Auto Debit, and online account creation and self-service
Audience	Non-default borrowers
Expected Date for Finalized Content	8/28/2023
Start Date	09/06/2023
End Date	n/a
Method	Letter
Status	Implemented

## September 2023

*System and CR-related communications:*

*Disclosures began going 8/28/2023 – 9/1/2023*

*Bills began on 9/8/2023 for payments due 10/1*

Title 1	Payment Reminders
Audience 1	Automate for borrowers with payments due from 10/1 – 11/30
	Send email to borrowers who have a payment greater than \$0 due in 7 calendar days

	<p>KM region borrowers who will have payments due between 10/1/2023-11/30/2023</p> <p>Exclusions: Borrowers with \$0 IDR payments</p>
CTA	<ul style="list-style-type: none"> <li>• How to Make a Payment</li> <li>• If you're on Auto Debit, your payment will be withdrawn</li> </ul>
Expected Date for Finalized Content	9/21/2023
Start Date	10/18/2023 (tentative)
End Date	11/23/2023
Method	Email
Success Metrics	Email Opens
Status	Approved by FSA – Pending Implementation

Title 2	Payment Notifications
Audience 2	Borrowers receiving an installment bill
CTA	<p>Add a callout on bills</p> <ul style="list-style-type: none"> <li>• How to Make a Payment</li> <li>• Options to have lower payments, if needed</li> </ul>
Expected Date for Finalized Content	8/29/2023
Start Date	9/8/2023, call out box not updated 9/28/2023, new call out box in production
End Date	11/6/2023
Method	Letter
Status	Implemented

Title 3	Payment Notifications – auto debit
Audience 3	Borrowers receiving a monthly auto debit letter
CTA	<ul style="list-style-type: none"> <li>• Add a Special content paragraph – options to have lower payments, if needed</li> </ul>
Start Date	9/9/2023
End Date	11/6/2023
Method	Letter
Status	Implemented

Title 4	MOHELA Call Center Deflection Messaging Phase 3
Description 4	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers

Expected Date for Finalized Content	9/21/2023
Start Date	9/21/2023
End Date	9/28/2023
Method	IVR
Status	Implemented

Title 5	Call Center Deflection Messaging Phase 3
Description 5	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	9/21/2023
Start Date	9/25/2023
End Date	9/28/2023
Method	Website
Status	Implemented

Title 6	Call Center Deflection Messaging Phase 3
Description 6	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	9/21/2023
Start Date	9/25/2023
End Date	9/28/2023
Method	Social Media
Status	Implemented

## October 2023

*System and CR-related communications:*

*Bills continue for payments due*

*10-day delinquency letter to non-opt out borrowers begins 10/11*

*Resume required due diligence*

Title 1	Delinquency Prevention
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Audience 1	Borrowers who never made a payment
CTA	Remind borrowers that they need to start making payments. Encourage them to seek help if they are unable to afford their first payment. Continue to encourage auto-debit and signing up for IDR (SAVE).
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Email
Success Metrics	Email clicks
Status	Pending Cancelled due to timing constraints

Title 2	Call Center Deflection Messaging Phase 4
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	N/A
Deflection Messages	Using Phase 4 messaging from FSA Playbook Version 23
Start Date	9/28/2023
End Date	To be determined
Method	IVR
Status	Completed

Title 3	Call Center Deflection Messaging Phase 4
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	10/2/2023
Start Date	10/3/2023
End Date	To be determined
Method	Website
Status	Completed

Title 4	Call Center Deflection Messaging Phase 4
Description 4	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be

	used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	10/5/2023
Start Date	Posting one image each week for three weeks, starting the week of October 9 <sup>th</sup> .
End Date	To be determined
Method	Social Media
Status	Completed

Title 5	Auto Debit Re-Enrollment
Description 5	<ul style="list-style-type: none"> <li>- Encourage borrowers to re-enroll in Auto Debit</li> <li>- Encourage borrowers to seek help if they are unable to afford their payments.</li> </ul>
Audience	Borrowers removed from Auto Debit
Expected Date for Finalized Content	10/13/2023
Start Date	Week of Oct 16, 2023 (tentative)
End Date	TBD
Method	Letter
Status	Pending FSA Approval

## November 2023

Title 1	Call Center Deflection Messaging Phase 5
Description 1	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	IVR
Status	Pending FSA Playbook updates to include Phase 5 messaging

Title 2	Call Center Deflection Messaging Phase 5
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns



Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Website
Status	Pending FSA Playbook updates to include Phase 5 messaging

Title 3	Call Center Deflection Messaging Phase 5
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Social Media
Status	Pending

## December 2023

Title 1	Call Center Deflection Messaging Phase 6
Description 1	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Deflection Messages	To be determined
Start Date	To be determined
End Date	To be determined
Method	IVR
Status	Pending

Title 2	Call Center Deflection Messaging Phase 6
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers

Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Website
Status	Pending

Title 3	Call Center Deflection Messaging Phase 6
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	*MOHELA will repost content shared by FSA to ensure consistent messaging.
Start Date	To be determined
End Date	To be determined
Method	Social Media
Status	Pending

## January 2024

System and CR-related communications:

### *On-Ramp Program communication*

Title 1	Delinquency Outreach
Audience 1	To be determined
CTA	Promote IDR/SAVE
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	To be determined
Success Metrics	To be determined
Status	Pending

Title 2	Call Center Deflection Messaging Phase 7
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined

Deflection Messages	To be determined
Start Date	To be determined
End Date	To be determined
Method	IVR
Status	Pending

Title 3	Call Center Deflection Messaging Phase 7
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Website
Status	Pending

Title 4	Call Center Deflection Messaging Phase 7
Description 4	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Social Media
Status	Pending

## February 2024

*System and CR-related communications:*

### *On-Ramp Program communication*

Title 1	IDR Self-Cert Push
Audience 1	To be determined
CTA	Promote IDR/SAVE
Expected Date for Finalized Content	To be determined
Start Date	To be determined

End Date	To be determined
Method	To be determined
Success Metrics	To be determined
Status	Pending

Title 2	Call Center Deflection Messaging Phase 8
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	IVR
Status	Pending

Title 3	Call Center Deflection Messaging Phase 8
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Website
Status	Pending

Title 4	Call Center Deflection Messaging Phase 8
Description 4	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Social Media

Status	Pending
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## March 2024

*System and CR-related communications:*

### *On-Ramp Program communication*

Title 1	Delinquency Outreach
Description 1	To be determined
CTA	Promote IDR/SAVE
Expected Date for Finalized Content	To be determined
Deflection Messages	To be determined
Start Date	To be determined
End Date	To be determined
Method	To be determined
Success Metrics	To be determined
Status	Pending

Title 2	Call Center Deflection Messaging Phase 9
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	IVR
Status	Pending

Title 3	Call Center Deflection Messaging Phase 9
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined

Method	Website
Status	Pending

Title 4	Call Center Deflection Messaging Phase 9
Description 4	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Social Media
Status	Pending

## April 2024

System and CR-related communications:

### *On-Ramp Program communication*

Title 1	Delinquency Outreach
Audience 1	To be determined
CTA	Promote IDR/SAVE
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	To be determined
Success Metrics	To be determined
Status	Pending

Title 2	Call Center Deflection Messaging Phase 10
Description 2	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA’s IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	IVR
Status	Pending

Title 3	Call Center Deflection Messaging Phase 10
Description 3	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Website
Status	Pending

Title 4	Call Center Deflection Messaging Phase 10
Description 4	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages will be used in MOHELA's IVR, Banner language on websites, and social media promotion in concert with FSA email campaigns
Audience	All non-default borrowers
Expected Date for Finalized Content	MOHELA will repost content shared by FSA to ensure consistent messaging.
Start Date	To be determined
End Date	To be determined
Method	Social Media
Status	Pending

## May 2024

Title 1	Loan Re-Amortization Repayment Term Monitoring Process
Description 1	During the payment pause, servicers were instructed not to run their loan re-amortization repayment term monitoring process. MOHELA will resume their regular schedule for running that process.
Audience	All non-default borrowers
Expected Date for Finalized Content	To be determined
Start Date	March 1, 2024
End Date	N/A
Method	Servicing system
Status	Pending

## June – October 2024

MOHELA will continue to refine the communications plan for this period as we get closer. It will include required communications for due diligence.

### Change Log

Version	Change summary
V2	Added sections: Overarching Communications Approach and Outreach Volume July 2023: Added details on deflection messaging for IDR account adjustment on the website and IVR, added Title 7 for IVR return to repayment messaging.
V3	Added Communication Pause for New IDR Flow Launch section. Added Contents. Added phases to Call Center Deflection Messaging tables Added May 2024 section, re-amortization monitoring resumes Added “Status” field to each table Updated progress made
V4	Updated August send dates for email communications and added Phase 2 deflection dates to align with FSA Playbook v10. Updated progress made. Updated Call Deflection activities to identify if an FSA Playbook requirement or an additional activity by MOHELA
V5	Updated information in June deflection messaging, per Playbook v11. Updated completed activities Added new August activity
V6	Updated based on Playbooks v12-15 Updated completed activities Added activities in August and September
V7	Updated based on Playbooks v16-19 Updated August activity statuses Added August and September activities
V8	Updated August and September activities
V9	Updated based on Playbooks v20-21 Updated completed August activities and email numbers Updated September activities
V10	Updated September activities Updated based on Playbook v22
V11	Updated September activities
V12	Updated and closed out September activities Updated October activities
V13	September activities: one update, one closed October activities: two updates, three closed
V14	Updated September activity Closed out October activity Noted November activities





October 16, 2023

The Honorable Elizabeth Warren  
United States Senate  
SH-309 Hart Office Building  
Washington, DC 20510

The Honorable Chris Van Hollen  
United States Senate  
SH-730 Hart Office Building  
Washington, DC 20510

The Honorable Edward J. Markey  
United States Senate  
SD-255 Dirksen Office Building  
Washington, DC 20510

The Honorable Richard Blumenthal  
United States Senate  
SH-706 Hart Office Building  
Washington, DC 20510

Dear Senators Elizabeth Warren, Chris Van Hollen, Edward J. Markey, and Richard Blumenthal:

MOHELA writes in response to your correspondence dated September 27, 2023. Your letter provides various queries regarding return to repayment and other student loan servicing activities. As a state instrumentality, which does not operate for a profit, MOHELA is keenly aware of its mission to assist student loan borrowers, particularly during this challenging time. MOHELA staff has been preparing for the opportunity to assist borrowers during this transition, including preparing and implementing new key contract terms and associated change requests issued by the U.S. Department of Education's office of Federal Student Aid (FSA).

FSA is the lender and owner for the loans we service. The terms of those loans are set by the government. Changes to our contract are performed through change requests by FSA and contract modifications. MOHELA is commissioned to help customers successfully manage their federal student loans within the universe of a steady-state environment and established requirements. Due to its temporary and extreme nature, Return-to-Repayment cannot be considered a steady-state environment.

It is important to note that as a federal contractor, MOHELA is paid a static fee per account status as of the end of each month for servicing via steady-state environment. New directives for the evolving loan servicing environment continue to arrive from FSA, and MOHELA must adhere to the requirements provided by the program administrator. Along with these new directives, which often require a very quick turnaround, millions of borrowers resumed repayment simultaneously after a multi-year pause. Nevertheless, FSA has allocated only limited funding for servicing during the unprecedented event and throughout the "on-ramp" period, funding which pales in comparison to the enormity of work associated with assisting millions of borrowers in a condensed time frame.

In addition, this unprecedented situation has drawn increased regulatory interest, which involves re-allocation of resources to respond to such inquiries as well as additional costs not covered by FSA. MOHELA continues to provide various self-service options, as directed by FSA, and works to ensure as many as possible customer service representatives are ready and able to answer borrowers' inquiries. Please note that MOHELA has relayed these concerns to FSA.

As requested, below are MOHELA's responses to your questions.

**1) What is the current average call wait time for borrowers before they are transferred to a customer service representative at your company?**

Due to this unprecedented situation, the current average is approximately 35 minutes.

**a) What percent of borrowers that are placed on hold hang up before they speak with a company representative?**

Due to this unprecedented situation, approximately 35% of borrowers placed on hold hang up before they speak with a company representative.

**b) What is your current call abandonment rate?**

In advance of this unprecedented situation, FSA made the decision that beginning July 1, 2023, it would not hold servicers to an Abandon Rate SLA, until further notice. Currently, the abandon rate is approximately 35%. Further, the unprecedented nature of the event makes any projection of email or call wait times likely to be purely speculative. As a result, projected average and maximum call and email wait times cannot currently be provided.

**2) How many steps does it take a borrower to navigate your Interactive Voice Response (IVR) menu from the time a call is connected until they are able to select an option to speak with a representative?**

After authentication, the shortest number of steps with direct navigation would be 2 steps, and the longest number of steps with direct navigation would be 3 steps.

**a) How many minutes does it take a borrower, on average, to navigate your IVR and select an option to speak with a representative?**

Approximately 3 minutes.

**b) Is the time it takes to navigate your IVR and select an option to speak with a representative included in the average call wait time metric provided in question #1?**

No, as the IVR allows the borrower to self-navigate for self-service and information at their choosing. Therefore, the average wait time only measures the time after a call leaves the IVR and before it reaches a CSR.

**i) If no, please provide an additional response that indicates the total amount of time, on average, it takes for a borrower to reach a representative at your company.**

Approximately 38 minutes.

**c) Is the time it takes to navigate your IVR and select an option to speak with a representative included in the abandon rate metric provided in question #1b?**

No, as above, a call is considered an abandon if it disconnects after leaving the IVR and before reaching a CSR.

**i) If no, please provide an additional response that indicates the total share of borrowers who contact your company but hang up before successfully navigating your IVR?**

With the self-service options and information provided in the IVR, MOHELA considers any caller that chooses not to speak to a CSR as successfully navigating the IVR. For September 2023, approximately 12% of the inbound calls were handled by the IVR.

**d) Have the number of steps changed in the past 12 months and, if so, how?**

Yes, the maximum number of steps has been reduced for all menu items (average reduction of 4 steps to 2 after authentication). The maximum number of steps after authentication in the self-service menu is 3 for the balance menu, but every other option takes 2 steps to reach upon entry into the self-service menu.

**3) What is the current average email response time for borrowers trying to get in touch with your company?**

Current average email response time is approximately 11 business days.

**4) How many borrowers have been transferred to you through the Department's Fresh Start initiative?**

Over 33,000.

**a) Describe the specific outreach you have made to borrowers transferred to you through Fresh Start. How many of these borrowers have responded to your outreach?**

MOHELA's outreach to Fresh Start borrowers has included welcome letters and outbound calls, though the latter have been subject to limited CSR availability. So far, over 30,000 have responded.

**b) How many of these borrowers have been placed in an IDR plan?**

Approximately 10,000 have been placed into an IDR plan.

**c) How many of these borrowers have set up an account with your company?**

The current count of Fresh Start borrowers that have a web account is over 8,000.

**d) How many of these borrowers have you made successful contact with?**

The entire Fresh Start transfer cohort has been mailed welcome letters.

**5) For each of the following months, what is your projected average and maximum call and email communication wait times? a) October, b) November, c) December**

MOHELA's contract with FSA does not have a Service Level Agreement (SLA) of speed of answer. The contracted SLA is related to Abandon Rate, and MOHELA forecasting is based on that percentage rate. Per our FSA Contract Modification: "Effective April 1, 2023 the Abandon Rate is no higher than 8%. Starting July 1, 2023, a servicer will not have their Abandon Rate SLA ranking reduced as a result of their Abandon rate during that performance period." MOHELA will strive to meet the 8% or less abandoned rate within its means.

Further, the unprecedented nature of the event makes any projection of email or call wait times likely to be purely speculative. As a result, projected average and maximum call and email wait times cannot currently be provided.

**6) If you offer scheduled callbacks, how many hours is the average borrower having to wait to get a callback?**

Approximately 1 hour.

**7) How many borrowers have complained about errors in calculating their monthly payment amounts?**

As of September 2023, MOHELA serviced roughly 7.8 million borrowers. From these, 537 complaints were received.

**a) What steps do you take to ensure borrowers' monthly payments were calculated appropriately?**

The system of record calculates the appropriate payment amount based on data, and the calculations are embedded in the system of record to comply for the particular plan for any Income Driven plans or Standard Repayment (Standard, Graduated, etc.) plans.

**8) What percentage of your staff are fully trained and responding to borrower inquiries?**

Currently, 81% of customer service staff are responding to borrower inquiries and of those, 20% are responding to borrower inquiries within a coaching environment. The remaining 19% is in training.

**9) What guidance are you receiving from the Department of Education regarding customer service quality assurance in the context of return to repayment?**

At this time, Federal Student Aid is performing "Secret Shopper" activity to provide specific feedback, including monitoring and vendor reviews. MOHELA and FSA are collaborating to address quality issues identified by either party. MOHELA is conducting multiple layers of quality assurance activities during the transition to repayment.

**10) What is your most recent Service Level Agreements (SLA) performance score for the following metrics? a) Customer Satisfaction b) Interaction Quality Monitoring and c) Accuracy rate**

As this is currently not published, MOHELA would refer your office to FSA for this information.

**11) What guidance are you receiving from the Department of Education regarding how to report missed student loan payments to credit reporting agencies during the on-ramp?**

As the Biden administration has noted, "...financially vulnerable borrowers who miss monthly payments during this period are not considered delinquent, reported to credit bureaus, placed in default, or referred to debt collection agencies...to protect borrowers from the harshest consequences of late, missed, or partial payments for up to 12 months. While payments will be due and interest will accrue during this period, interest will not capitalize at the end of the on-ramp period. Additionally, borrowers will not be reported to credit bureaus, be considered in default, or referred to collection agencies for late, missed, or partial payments during the on-ramp period. Future monthly bills for borrowers not enrolled in an income-driven repayment plan will be automatically adjusted to reflect the accrued interest during those months...this on-ramp period gives borrowers who cannot make payments right away the necessary time to adjust, enabling them to ultimately make their monthly payments and meet their financial obligations on their loans. Borrowers do not need to take any action to qualify for this on-ramp."

Department guidance on the issue has been consistent with this rulemaking summary from the administration, and has largely been provided through a nonpublic change request in regard to this topic.

**a) What do you report to credit reporting agencies if a borrower misses monthly payments during the on-ramp?**

If a borrower is less than 90 days delinquent, they will continue to be reported as 'Current.' If a borrower reaches at least 90 days delinquency during the on-ramp period, a forbearance is placed to prevent negative credit reporting.

**b) What are you telling borrowers regarding the consequences of missed payments during the on-ramp?**

MOHELA utilizes FSA’s suggested scripting:

“Normally if you miss three monthly payments, your loan(s) would be considered delinquent and reported to the national credit reporting agencies. However, the U.S. Department of Education has created a temporary on-ramp period to support you as you start or restart payments following the pandemic pause. As part of the on-ramp, if you miss too many payments we will apply a forbearance to your student loan account for the payments you missed.

Here’s what this means:

- Your account will no longer be considered delinquent and will be made current.
- Your recent missed payments will not lead to negative credit reporting.
- Your loans are not being sent to collection agencies.

However, interest has accrued during these months of missed payments and your monthly payments may increase to account for the accrued interest.”

**12) How many borrowers have been transferred to your company since February 1, 2020?**

Since February 1, 2020, over 4 million borrowers transferred to MOHELA from other federal servicers.

**a) How many of these borrowers have you made successful contact with?**

Borrowers may call in after getting communication from MOHELA, Federal Student Aid, the Department of Education, the White House, or seeing information in the news or on social media, so it is difficult to establish that MOHELA’s communication prompted the successful borrower contact. However, the number of borrowers who contact by phone or web within the last 90 days is regularly tracked and reported. MOHELA has contacted via letter, phone, or email over 4 million borrowers. As borrowers anxiously await approval for additional forgiveness approvals from FSA for IDR, PSLF or other programs, borrowers will likely attempt contact through one or multiple communication methods.

**b) How many of these borrowers have set up an account with your company?**

Over 2 million transferred borrowers have set up an online account.

**13) Describe the outreach to the over 2.5 million ED-backed FFEL borrowers about the benefits and risks of loan consolidation.**

While FSA has not asked for MOHELA to provide outreach specifically to its ED-held FFEL borrowers about the benefits and risks of loan consolidation, MOHELA appropriately discusses consolidation options with eligible borrowers in the context of phone and email contact. Further, MOHELA’s website outlines the advantages and disadvantages of consolidation to the ED-backed FFEL borrowers MOHELA services at [www.mohela.com/DL/resourceCenter/consolidation.aspx](http://www.mohela.com/DL/resourceCenter/consolidation.aspx). Additionally, using its data and email system periodically throughout the COVID pause, FSA has directed communications specifically to MOHELA’s ED-held FFELP borrowers regarding this and other topics.

**14) Please provide the most recent version of the Return to Repayment, Student Debt Relief, and Income Driven Repayment New Communication Playbook.**

The current Communication Playbook is included as requested.

As you also noted, as of August, millions of transferred borrowers had yet to create accounts with their new servicers. MOHELA conducted outreach campaigns during transfers, but we suspect many borrowers had no real sense of urgency because repayment was suspended and many expected their loans to be discharged

based on the Administration's statements, leading many borrowers to wait until the last minute. Additional proactive communications surrounding repayment resumption could have helped reduce these numbers.

MOHELA is willing to engage on this topic, as well as supplement the foregoing with any additional detail that you believe would be helpful. The opportunity to provide your offices with the facts necessary to make informed decisions is very much appreciated. If you or your office staff have any additional needs regarding the company, its role as a federal servicer, or about the student loan process, please do not hesitate to contact MOHELA.

MOHELA appreciates the opportunity to provide your offices with the facts necessary to make informed decisions regarding student loan servicing and our work, and thanks you for your questions. If you or your office staff have any additional needs regarding our company, its role as a servicer, or about the student loan process, please do not hesitate to contact MOHELA. We are happy to assist while you are carrying out the critical role you perform in the government process.

Sincerely,  
MOHELA



October 12, 2023

The Honorable Elizabeth Warren  
United States Senate  
Washington, DC 20510

Dear Senator Warren:

Nelnet received your letter expressing concern regarding the repayment resumption for millions of federal student loan borrowers, a concern we have also raised on multiple occasions. With proactive planning and advanced communication with servicers and borrowers, the Federal Government could have avoided foreseeable borrower impacts and created a better customer experience. Over the course of the student loan repayment pause, we frequently communicated concerns to Congress and the Biden Administration about the U.S. Department of Education Office of Federal Student Aid (FSA) and third-party servicer capacity to best support borrowers in return to repayment, given the increase in program complexity and decrease in available resources. Unfortunately, during this unprecedented period, our concerns were not addressed.

We support your call on Congress to ensure FSA has the appropriate resources to protect and support borrowers during their return to payment. As a third-party service provider for the Federal Government, this letter addresses our ongoing commitment to supporting successful borrower outcomes and explains the increasingly challenging and underfunded Federal student loan program. With respect to the metrics requested in your letter, two federal agencies, FSA and the Consumer Financial Protection Bureau (CFPB) are closely monitoring servicing activity during return to repayment, and we encourage you to reach out to them for data.

### **Following Our Map: Servicers Work for and at the Direction of FSA**

As a third-party service provider for the Federal Government, we operate according to our contract with and as directed by FSA. As such, FSA directs when and with what information we communicate to borrowers.

Federal student loan repayment has never been paused nationally, and many consumers are first-time borrowers with no loan repayment experience. Borrowers deserve, and should have received, guidance and direction from the Federal Government on how to access program benefits and how to successfully enroll in a repayment plan aligned with their financial needs. Unfortunately, borrowers were instead met with confusing and conflicting announcements of program changes, were told no payments were required, that interest would not accrue, indefinitely, and were promised their loans would be discharged.

Your letter states, "We are particularly concerned that, as of August, loan servicers had not been in contact with millions of borrowers." We shared this same concern in our August letter to you, where we reported FSA had directed us not to send proactive borrower communications regarding return to repayment and available payment options. We saw the obvious value of providing information early in the process, but we can communicate with borrowers only in accordance with the terms of our federal contract. FSA directed us to begin those communications in August.



As you also noted, as of August, millions of transferred borrowers had yet to create accounts with their new servicers. We conducted outreach campaigns during transfers, but we suspect many borrowers had no real sense of urgency because repayment was suspended and many expected their loans to be discharged based on the Administration's statements, leading many borrowers to wait until the last minute. Additional proactive communications surrounding repayment resumption could have helped reduce these numbers.

### **Self-Inflicted Wounds: Federal Government Actions and Changing Relief Programs Cause Borrower Confusion and Amplify Borrower Anxiety**

Leading up to the return to repayment, Federal Government actions and public policy announcements were made with little to no prior communication to servicers and without regard for the time and effort required to update computer systems, increase staffing, and train people to put those changes in place. Servicers were caught flatfooted to deal with unanticipated call volume and could not properly prepare to answer borrowers' questions.

Returning to repayment is an unfamiliar situation for many borrowers, and unfamiliarity breeds anxiety. As we noted in our August letter, "since March 2020, borrowers have experienced new life events, families have experienced new hardships, and new borrowers have taken out Federal student loans without having experienced interest accrual or needing repayment assistance. Many borrowers now find themselves uncertain about how to resume (or begin) repayment, or even how much they owe." If we can't help them because FSA hasn't given us the necessary resources to adequately hire, train, and deploy customer service representatives, that anxiety and confusion is amplified. As journalist Cory Turner noted in the September 11, 2023, NPR story you cited, "[T]he system is more complex than ever, with the Education Department and servicers rolling out a new repayment plan at the same time the department is doing an unprecedented review of borrowers' records and adjusting millions of accounts."

For additional context, a few examples of government actions enhancing the problems:

- Upon announcement of the Biden-Harris Student Loan Relief program, the Federal Government and outside organizations encouraged borrowers to contact their servicers to ask for refunds of voluntary payments made while in the CARES Act forbearance. The media presented this as a way for borrowers to maximize loan forgiveness. This flooded call centers and created large refund backlogs in our operational accounting area. Also of note, once the U.S. Supreme Court struck down the program, we experienced call volume due to borrower confusion about refund processing and how such requests, many still in process, would impact monthly payment amounts when payments resumed.
- On the same day the U.S. Supreme Court ruled that the Biden Administration's \$400 billion loan cancellation plan could not go forward, President Biden announced a new student loan debt relief plan, but no details. Naturally, borrowers called servicers seeking information. FSA didn't have information and directed us to add messaging to our website and phone system noting just that.
- On July 14, the Biden Administration announced \$39 billion in student loan forgiveness for 804,000 borrowers. Again, servicers had no advance notice and call volume spiked from borrowers asking if their loans were forgiven.





- In August, with little warning to servicers, the Federal Government urged borrowers to contact their servicers by September 1, to find out if they qualified for the Saving on a Valuable Education (SAVE) program. Once again, calls increased significantly, many borrowers hung up, and understandably, frustrations ran high.
- On October 2, the Biden Administration announced another \$9 billion in student loan forgiveness for 125,000 borrowers. Again, servicers received no advance notice, making it impossible to update phone and website messaging with information for borrowers seeking details about the announcement or prepare agents with adequate information to field borrower calls.
- FSA is encouraging all borrowers to submit Income-Driven Repayment (IDR) applications, but many are already in the SAVE program, creating multiple applications, confusion, and delays.

### **Transfers of Loans to a New Servicer Carries Risk: Nelnet Has Worked to Minimize Impact Despite Federal Inaction on Longstanding Concerns**

Since at least 2015 Federal Direct loan servicers have requested and proposed changes to improve the federal loan transfer process. To date, none of the changes to this outdated and inflexible process have been implemented which was painfully obvious as loans transferred from the Pennsylvania Higher Education Assistance Authority (PHEAA) to other servicers on a very aggressive timeline following their exit from the program.

Transfers of massive amounts of data are inherently made more challenging because there are no standard communications, web presence, or other servicing processes and borrowers are naturally confused when they are moved to a new servicer. As a result, Nelnet has devoted significant time and resources to identifying and addressing these inherent challenges, including issues we identified in the PHEAA transfers, and on which we continue to wait for FSA resolution.

On the other hand, Nelnet's transfer of nearly 11 million borrowers over 20 months from the Great Lakes servicing platform was a great success. Less than three percent of accounts in those transfers required manual intervention to ensure all data fields were accounted for and in the correct format, and those that did require such intervention were identified and resolved prior to final conversion, avoiding borrower impact. For these transfers, we worked collaboratively with FSA and we had sufficient time and resources to execute the transfers the right way.

### **A Recipe for Failure: Program Changes and Resulting Implementation Decisions Have Hindered Servicing Processing, Increased Manual Work, and Negatively Impacted Borrowers**

As we return to repayment, a series of program changes and implementation decisions by the Federal Government have fueled unfavorable borrower outcomes beyond our control. For example:

- In preparing to implement SAVE we requested the approved borrower application form. We did not receive it ahead of time but eventually, we discovered it on StudentAid.gov and immediately updated our training materials to prepare our processors for interest to restart on September 1.



- A recalculation of income-driven repayment qualifying information was mandated for all borrowers who were transitioning from Revised Pay As You Earn (REPAYE) to SAVE by the end of August 2023, but we were not allowed to begin working these applications until July 30, 2023. 700,000 borrowers required redisclosures, and nearly 60,000 had to be manually worked, which in turn took significant resources away from processing incoming applications.
- During the same period, Nelnet was prohibited from informing REPAYE to SAVE borrowers that the recalculation was in process and, as a result, many borrowers submitted unnecessary applications that nonetheless had to be reviewed. This, in addition to the proactive processing, created duplication of effort, again diverting our associates from other work supporting borrowers.
- The continued changes in SAVE guidance post-implementation required us to change processing protocols, work guides, and our processing system, which required additional manual intervention, and new borrower communication updates for applications that had already been processed.

### **Recalculation Errors: Rushed Decisions and Bad Data Result in Bad Calculations**

The \$1.645 trillion in federal student loan debt is arguably the country's most complicated consumer financial product. Student loan borrowers with little or no experience with debt, let alone complex debt, require accurate information as they make decisions around repayment. Unfortunately, on the eve of the return to repayment, the process of calculating payments was changed. Your letter notes, "Borrowers across the country are reporting incorrect payment calculations." We did not make the decisions that created these challenges, and despite a lack of resources, servicers worked tirelessly to get good data verification and process millions of accounts in record time. While we were not able to fully automate this process in the short period allowed, Nelnet's process was sound and our manual fallout rate was low. We have seen no errors in our automated or manual processing, and we continue to work with FSA and the CFPB to review individual accounts needing manual adjustment due to inaccurate or incomplete borrower information.

The process was further impacted on August 1 when borrowers were no longer allowed to self-certify income on studentaid.gov. Now borrowers who apply through studentaid.gov cannot have their payments calculated automatically, and they may have to send us additional documents. These applications then must be manually adjusted, requiring additional time and resources. However, borrowers who apply through our website are able to self-certify and thus be processed automatically.

Incorrect payment calculations also occur because:

- Studentaid.gov stopped rejecting incomplete applications, leaving it to servicers to contact those borrowers for income information;
- In-school borrowers were told by FSA to complete the application even though they weren't eligible, and servicers had to deny their applications, again increasing frustration and anxiety;



- Borrowers incorrectly entered large income amounts on their applications, resulting in higher payments based on those income totals; and
- The prior servicer incorrectly calculated the payment amount while the new servicer correctly calculated it based on FSA's guidance.

### **Servicer Compensation Matters You Can't Cut Your Way to Success**

The federal student loan program is an immensely complicated program with constantly changing requirements and benefits. For many federal student loan borrowers, participation in the program marks their first interaction with debt financing and loan repayment, making high-quality servicing especially important. Despite these truths, the federal government pays third-party servicers a rate less than 1/10 of the average rate for third-party mortgage servicing (according to publicly available data from the Mortgage Bankers Association), a less complicated asset to service. While federal student loan servicers continually strive to do more with less, the compensation we receive severely limits our options.

Add to that Federal budget cuts which impaired servicers' ability to properly staff our call centers in the months leading up to repayment. As you know, Nelnet had staffed up for a January 2023 return to repayment date, which was then extended to September. However, while Nelnet had staffed up, we were forced by the Federal Government's unexpected fee reductions to servicers to eliminate 800 customer service agents in the first quarter of 2023. We knew, and **clearly** communicated to FSA that this would also impact the speed at which we could ramp back up for repayment, as the hiring, training, and security clearance process takes months to perform, relies on FSA approvals, and is only possible if returning to repayment is certain and under the contractual rate for repayment servicing (a rate much higher than servicing in forbearance). When repayment was finally a reality, we attempted to rehire many of the associates we had laid off and streamlined our onboarding and training processes, but at the lower rates we could not, as we noted in August, "hire the staff needed for the repayment surge until after repayment [began] and servicing fees return[ed] to repayment levels."

We have been consistent in our communication. For three years we have very vocally warned that reduced fees and continued extensions of the payment pause meant it would be highly unlikely we would be prepared to manage call volume when repayment finally began.

- In October 2020, we advised then-FSA Chief Operating Officer Mark Brown that a servicing fee reduction prevented Nelnet from hiring enough staff for the planned December 2020 return to repayment, and this would impact service levels, including abandonment rate.
- In late 2021, we hired hundreds in reliance on a February 1, 2022, return to repayment. In late December 2021, when repayment was delayed to May 2022, we did not have time to reduce staff and then rehire, instead, we kept staff on at the reduced rates and incurred tens of millions of dollars in expense.



- A January 2022 letter to FSA's chief operating officer Richard Cordray detailed our concerns, as did communications in September 2022 after the repayment date was extended to December 2022.

In your letter, you noted that you are “skeptical of the claim that insufficient funding is keeping [servicers] from fulfilling their most foundational obligation considering that they were paid on average approximately \$2 a month per account amounting to billions of dollars, while payments, interest, and collections were suspended during the public health emergency.” But servicers were not sitting idly by during the repayment pause. Our work was not suspended. Borrower calls continued, millions of accounts had to be managed, bulk borrower transfers increased significantly, new programs were announced and had to be implemented, and on nine occasions the government announced a return to repayment, triggering staffing, training, and technology updates, only to later extend it further and reverse those efforts. And, as with everything else in this economy, our costs for system maintenance, technology infrastructure, and cybersecurity increased substantially during the three-and-a-half-year forbearance period.

### **Working Together for Borrowers’ Best Interests**

In closing, I thank you for and support your advocacy before Congress to ensure FSA has the appropriate resources to protect and support borrowers during their return to repayment, and we share your concerns about a return to repayment for millions of borrowers. As we have for over 40 years, we will continue to operate with borrowers’ best interests at the forefront. Since March of 2020, the program has become exceedingly more complex to service. Borrowers have not received the support and information they deserve with enough time to prepare, and regrettably, decisions by the Federal Government have further complicated our ability to best serve borrowers. While we believe all of this was preventable, we will continue to work to minimize borrower confusion and anxiety and help promote successful repayment. The best interests of borrowers, servicers, and the government will be served by stronger communication and deeper collaboration.

We eagerly await Congress’s decision on fiscal year 2024 appropriations as we prepare for the possibility of further reductions in service levels due to inadequate funding, and we hope your efforts to ensure FSA has appropriate resources to protect and support borrowers are successful.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey R. Noordhoek". The signature is written in a cursive, flowing style.

Jeffrey R. Noordhoek  
Chief Executive Officer  
Nelnet

CC: Senator Richard Blumenthal  
Senator Chris Van Hollen  
Senator Edward J. Markey



October 11, 2023

The Honorable Elizabeth Warren  
United States Senator  
309 Hart Senate Office Building  
Washington, DC 20510

The Honorable Richard Blumenthal  
United States Senator  
706 Hart Senate Office Building  
Washington, DC 20510

The Honorable Chris Van Hollen  
United States Senator  
730 Hart Senate Office Building  
Washington DC 20510

The Honorable Edward J. Markey  
United States Senator  
255 Dirksen Senate Office Building  
Washington, DC 20510

**RE: Edfinancial Response to letter dated September 27, 2023**

Dear Senators Warren, Blumenthal, Van Hollen, and Markey:

We are writing in response to your letter dated September 27, 2023, to Edfinancial Services, LLC (“Edfinancial”) in which you have requested information about the return to repayment for millions of federal student loan borrowers. It is and always has been the mission of Edfinancial Services to strive to provide exceptional services, while always doing the right thing for our customers. We continue to take that mission very seriously. Despite our best preparation efforts, this has been a challenging time.

We, together with other servicers, previously voiced our valid concerns about the challenges and risks associated with this unprecedented, one-time event. As if the enormity of return to repayment itself were not enough, an entirely new IDR program (SAVE) was introduced in July, driving up IDR application volumes to numbers no one could have reasonably predicted. We are also working diligently now to process thousands of one time IDR adjustment discharges. Every communication that is sent to borrowers or announcement that is made in the media regarding new plans and discharges drives up borrower contacts to their servicers leaving us with no reliable way to predict volumes on a daily basis. Higher call volumes and wait times under these conditions should not be considered a surprise development.

We have been hiring and training hundreds of new staff. Keep in mind that until June 30, we had no idea whether the student loan portfolio under management would be cut by one third due to debt cancellation, resulting in the need for layoffs and downsizing. Portfolio size logically drives staffing needs. Since July we have increased our staff to 1,233 employees with plans to hire approximately 230 more employees through October. As described in detail in our August 1 letter, our training process for new hires is complex, thorough and takes time. In addition, we have had to incorporate into an already comprehensive training curriculum new information about the ongoing changes with PSLF, SAVE, Fresh Start, On-Ramp, and the one-time IDR adjustments and discharges.

The return to repayment has been unpredictable for student loan servicers, with ever-shifting circumstances and deadlines. This is on top of the already difficult task of transferring millions of student loan accounts caused by servicers' decisions that it no longer makes business sense to provide these vital services to the federal government. Through it all, Edfinancial has sought to be a good and diligent partner with the Department of Education to serve Americans whose education the Department financed. This commitment is reflected in Edfinancial receiving the highest ranking among federal servicers in the past four evaluated quarters.

Edfinancial is aware that certain regulators have stated they intend to pursue an aggressive enforcement agenda, despite reduced funding for servicers at a time when the demand for those services has risen exponentially. Edfinancial takes its legal and contractual obligations seriously and is working hard to staff, train, and monitor its customer-service function as we return to repayment. Our hope is that the government that hired us to perform this critical service would reciprocate our partnership and work together with us for the benefit of American consumers.

### **Customer Inbound Communications.**

Edfinancial has been hiring, training and releasing hundreds of staff to respond to borrowers' incoming calls and correspondence. We have required mandatory overtime of our staff during the ramp up to repayment. We are proud of our team members who have gone above and beyond by putting in significant mandatory as well as voluntary overtime. As a result, our call wait times have improved significantly from an over 20% abandonment rate in August to an average abandonment rate in the high teens in October with numbers continuing to show improvement. We are focused on improving more and more each day.

We do want to note that our current call wait volumes are not representative of our performance in steady state loan servicing conditions. In the current return to repayment environment, our abandonment rate fluctuates with each day; it is impacted significantly by communications to borrowers, press releases and other media activity much of which is beyond our control. We leverage our interactive voice response (IVR) system to the extent possible to meet our customers' needs. We do provide callers with the option to request a callback and call customers back within 24 business hours.

Our current written response times are longer than historical response times due to the current extraordinary circumstances and high volumes of borrower contacts. In addition, our email responses require more research than usual because borrowers have many valid questions regarding the new updates recently made to the federal student loan program.

Based on the uncertainty and continually evolving circumstances of this transitional period, it is impossible to project with a reasonable expectation of accuracy average and maximum call and email communication wait times for the upcoming months.

### **Department of Education Initiatives and Guidance**

We are working closely with FSA in administering their Fresh Start initiatives in accordance with their instruction to us pursuant to our servicing contract. We have received 44,469

borrowers in the Fresh Start category. We are submitting with this letter version 24 of FSA's Return to Repayment, Student Debt Relief, and Income Drive Repayment New Communication Playbook. See the playbook for communications about Fresh Start.

The on-ramp transitional period begins October 1, 2023 and runs through September 30, 2024. During this on-ramp period, negative credit reporting will not occur for missed, late or partial payments. If payments are missed and the borrower becomes 90 or more days past due, the loans will automatically be placed into a forbearance for the payments missed and a communication will be sent to the borrower to advise that the on-ramp forbearance was applied to bring their account current. The communication will also provide information for the borrower to explore affordable repayment plans (such as an Income-Driven Repayment (IDR) plan), Auto Pay enrollment, and loan forgiveness eligibility.

Servicers will not report a borrower as being delinquent to the credit reporting agencies should a borrower miss a payment during the on-ramp. The borrower will be reported as "Current". Edfinancial continues to inform borrowers of the consequences of missed payments, including the accrual of interest and potential that monthly payments may increase to account for the accrued interest. We are following communication guidance provided by the Department of Education to ensure borrowers are provided consistent information and are aware of the consequences of delinquency during the on-ramp period.

Our agents routinely discuss the benefits and risks of consolidation with FFEL borrowers. Among other resources, we have quickmailers that our agents send to borrowers who are interested in learning more about consolidation. We also direct customers to [studentaid.gov/loan-consolidation](http://studentaid.gov/loan-consolidation) for more information.

### **Edfinancial's Performance**

In the last four evaluated calendar quarters Edfinancial received the highest overall score among all federal servicers. As a result, Edfinancial has been receiving the highest percentage of newly originated federal direct loans. Such consistency, especially in the metric of Customer Satisfaction, requires meticulous planning and execution. We must point out that strategizing and planning has been extremely challenging due to the ongoing changes in student loan programs and policy, which requires not only significant pivoting in strategy but also system programming, recalibration training for our staff, and various other steps to mitigate confusion among borrowers.

- a. Customer Satisfaction: 75 (highest of all servicers)
- b. Interaction Quality Monitoring: 60 (highest of all servicers)
- c. Accuracy Rate: 15 (same as all other servicers)

In closing, Edfinancial continues to work diligently to assist borrowers as they navigate return to repayment.

Sincerely,

Edfinancial Services



## **Return to Repayment, Student Debt Relief, and Income Driven Repayment New Communications Playbook**

Federal Student Aid's Outreach Plan to Borrowers

September 28, 2023

Version 24



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## Overview

On March 13, 2020, the president signed the *CARES Act*, which implemented several student loan flexibilities for borrowers of Department of Education (ED)-held student loans. These flexibilities ranged from (but were not limited to) interest rates being set to 0% to not requiring borrowers to make their monthly student loan payments. These COVID-19 emergency relief flexibilities were extended multiple times, and as they end, interest will begin accruing for borrowers on Sept. 1, and payments will resume in October. The latest information on these emergency relief flexibilities can be found on [StudentAid.gov/coronavirus](https://StudentAid.gov/coronavirus).

FSA has devised an approach that plans for several communications to be sent out via numerous communication channels beginning now until March 2024. FSA will author most of the communications and will leverage its available communication channels and capabilities, or the capabilities of its servicers, to ensure these communications reach every borrower before, during, and after payments resume later this year.

This document is intended to provide a roadmap for each servicer and supporting vendors on the following topics:

- When FSA intends to send out communications to borrowers and via what channel
- The different audiences FSA intends to reach
- How planned vendor communication beyond this plan should be handled and sent to FSA for review and approval

New for this version of the playbook is also information on our communications related to Student Debt Relief (SDR), the new proposed income-driven repayment (IDR) plan Saving on a Valuable Education (SAVE) (formerly known as REPAYE), and the new functionality on [StudentAid.gov/idr](https://StudentAid.gov/idr).<sup>1</sup> Information on these communication items is now also included throughout this playbook. Additionally, we will be providing language at certain points in time for servicers to use in their IVR and websites to help with coordinated call deflection actions to promote borrower self-service.

FSA intends to update this document on a regular basis as new information becomes available or its communication plan changes. All correspondence and/or questions related to this communications playbook should be sent to [FSACaresActComms@ed.gov](mailto:FSACaresActComms@ed.gov) and [FSAVendorManagementTeam@ed.gov](mailto:FSAVendorManagementTeam@ed.gov). Servicers must designate at least two email addresses to receive correspondence regarding these communications efforts and notify the [FSACaresActComms@ed.gov](mailto:FSACaresActComms@ed.gov) email box of these email addresses.

## Main Return to Repayment Communication Segments

In the context of return to repayment FSA will target communications to several specific borrower segments. While numerous segments will be listed below, it is likely that borrowers will fall into multiple categories. Additionally, the messaging to many of these segments will be the same, and as a result, the number of unique messages that will be sent in any given time will likely be less than the total number

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<sup>1</sup> The Department plans to finalize a new IDR plan in the coming weeks. This playbook contains details about the plan and timing of communications that may change based on the final rule. For more information on SAVE visit [StudentAid.gov/SAVE](https://StudentAid.gov/SAVE).

of identified borrower segments. Additionally, if a borrower falls into multiple segments, they will be prioritized to get a message in one segment only. Finally, depending on the Supreme Court decision on debt relief additional segments may be added in the future.

### At-Risk Segment

The segments listed below are those that FSA intends to reach when you see the main communication segment label of “At Risk” within a communication send or outreach effort. Note the audiences that are marked (TEDI) are part of the Targeted Early Delinquency Intervention program described later in this document.

Segment
Borrowers who will enter another deferment or forbearance not otherwise defined when payments resume (would have to recertify a deferment or conditions to get back in)
Borrowers who have recently transferred in the past three months to a new federal student loan servicer
Perkins borrowers that are currently serviced by ECSI
Borrowers currently on an IDR plan but have not recertified or recalculated their monthly payments during the payment pause
Borrowers who attended a private for-profit institution and graduated
GA FFEL borrowers who entered default after March 13, 2020, and are being reassigned to Nelnet under the Special Mandatory Assignment process (TEDI)
Borrowers who were 30+ days delinquent immediately prior to March 13, 2020, and had their delinquency resolved due to the payment pause (TEDI)
Borrowers who successfully rehabilitated their defaulted loans during the payment pause (TEDI)
Borrowers who opted into Fresh Start and had their loans transferred to a non-default servicer (TEDI)
Borrowers who did not complete their program of study at a private for-profit institution before or during the payment pause and currently have a loan balance (TEDI)
Borrowers who did not complete their program of study at a non-profit school before or during the payment pause and currently have a loan balance (TEDI)
Borrowers who previously missed their first payments after exiting grace before the payment pause and still have a balance remaining (TEDI)
Borrowers who entered into a non-administrative forbearance on two or more occasions before the payment pause at any point in time and have a balance remaining (TEDI)
Borrowers who paused, missed, or made partial payments while enrolled on an IDR plan before the payment pause (TEDI)
Borrowers who missed two or more consecutive payments on three or more occasions (TEDI)
Borrowers who entered a non-administrative forbearance for a period longer than a year before the payment pause (TEDI)

### Soon to Make Payments Segment

The segments listed below are those that FSA intends to reach when you see the main communication segment label of “Soon to Make Payment” within a communication send or outreach effort.

Segment
Will exit the grace period after the payment pause

Borrowers who never made a payment and will make first payment after payment pause ends
---

### In Previous Good Standing Segment

The segments listed below are those that FSA intends to reach when you see the main communication segment label of “In Previous Good Standing” within a communication send or outreach effort.

Segment
In good standing and on an IDR Plan, including those that have recertified or recalculated their monthly payments during the payment pause
In good standing and on any (non-IDR) repayment plan

### Currently Making Payments Segment

The segments listed below are those that FSA intends to reach when you see the main communication segment label of “Currently Making Payments” within a communication send or outreach effort.

Segment
Opted out of COVID Administrative Forbearance (currently in a repayment status)

### No Payment Due Segment

The segments listed below are those that FSA intends to reach when you see the main communication segment label of “No Payment Due” within a communication send or outreach effort.

Segment
In School when payment pause ends (In school deferment)
Awaiting discharge or adjudication of discharge application, such as forbearances related to Borrower Defense, account adjustment, or other forgiveness programs
In a deferment or forbearance, for example military borrowers

### Fresh Start Segment

The segments listed below are those that FSA intends to reach when you see the main communication segment label of “Fresh Start” within a communication send or outreach effort.

Segment
GA FFEL defaulted borrowers pre-March 13, 2020
All DMCS borrowers

Specific communications only related to IDR and/or SAVE will be colored in light green in the communications schedule.

## Main Student Debt Relief Communication Segments

As part of the return to repayment communication efforts, FSA will also prepare certain communications as it relates to a Supreme Court (SCOTUS) decision on Student Debt Relief (SDR). Once a decision is made, FSA will communicate with all borrowers about the impact of the decision. Specific comms only related to SDR will be colored in light orange in the communications schedule.

Possible Segments
Eligible for SDR, have not applied
Applied for SDR, in processing
Applied for SDR, approved but not yet in processing
All who applied for SDR
All who have not applied for SDR
All DL, all-ED-held FFEL, ED-held Perkins, and defaulted commercial borrowers

## Main Income-Driven Repayment Communication Segments

Additionally, during the return to repayment and SDR communication timeframe FSA will also be communicating with borrowers about the changes being implemented for IDR on July 30, 2023. This will also be when unique communications to borrowers specifically about the SAVE IDR plan will also begin to be sent and last till the end of 2023 into 2024. There will be strong overlap between FSA return to repayment and IDR communications as many of the calls to action FSA intends will focus borrowers to consider and sign up for IDR to prepare to resume payments. While there are no specific segments FSA will target all eligible borrowers. Specific communications only related to IDR and/or SAVE will be colored in light yellow in the communications schedule.

## Communication Schedule

### Outreach related to ACH/Auto-Debit

Servicers – R2R Focus	
Title 1	Outreach to all borrowers based upon their ACH status (CR5881)
Audience 1	All borrowers who are on ACH, but by sign up status (CR5881)
Description 1	Outreach to encourage borrowers to reconfirm their auto-debit
Expected Date for Content to be Available for Review	Previously Provided
Start Date	All reminder communications should be completed.  Unenrollment can begin on August 22, 2023, <b>but must begin on August 28, 2023</b> , using the previously approved communication that each servicer provided for FSA to review. Please double check that dates are accurate in your messaging as it relates to return to repayment if you do include dates.
End Date	All reminder communications should be completed.

	Unenrollment communications should be completed before a borrower receives their billing statement.
Method	As defined in CR5881

June 2023

Servicer – SDR Focus	
Title 1	SCOTUS Decision Update
Description 1	<p>Immediately after the release of the SDR decision servicers should place on their website and IVR the following statements:</p> <p><b>Website:</b> The Supreme Court has issued a ruling on whether the U.S. Department of Education can move forward with the Biden-Harris Administration’s student debt relief program. As soon as information is available, it will be posted to <a href="https://StudentAid.gov/debtrelief">StudentAid.gov/debtrelief</a>. Please visit that page for more information.</p> <p><b>IVR:</b> The Supreme Court has issued a ruling on whether the U.S. Department of Education can move forward with the Biden-Harris Administration’s student debt relief program.</p> <p>Our agents do not have additional information at this time about the debt relief program or an application you submitted previously. As soon as information is available, it will be posted to <a href="https://studentaid.gov">studentaid.gov</a> forward slash debtrelief.</p> <p>Thank you for your patience.</p>
Audience 1	All borrowers
Expected Date for Finalized Content	Already provided
Start Date	June 30, 2023
End Date	July 21, 2023
Method	Website Banner and IVR Updates

Servicer – R2R Focus	
Title 1	Return to Repayment Date Confirmation
Description 1	<p>Servicers should put the following banner on their website and IVR.</p> <p><b>Website/IVR:</b> Congress recently passed a law preventing further extensions of the payment pause. Student loan interest will resume starting on September 1, 2023, and payments will be due starting in October.</p> <p>Borrowers will receive a billing statement from their loan servicer at least three weeks before their payment is due.</p>
Audience 1	All borrowers

Expected Date for Finalized Content	Already provided
Start Date	June 13, 2023
End Date	Servicers may continue as they see fit in concert with future deflection phases and their own deflection needs.
Method	Website Banner and IVR Updates

## July 2023

Federal Student Aid – SDR Focus	
Title 1	Update on SDR Decision
Description 1	Broad update on the SDR decision to all borrowers with mentioning of SAVE and the On-Ramp
Audience 1	All non-default and default borrowers
Expected Date for Finalized Content	July 11, 2023
Start Date	July 12, 2023
End Date	July 17, 2023
Method	E-mail

Federal Student Aid – R2R Focus	
Title 1	Return to Repayment Resources are available
Description 1	Focused return to repayment message that the payment pause will be ending, when they should get billing statements, steps they can take now, and who is their loan servicer.
Audience 1	At Risk, Soon to Make Payments, In Previous Good Standing
Expected Date for Finalized Content	July 11, 2023
Start Date	July 21, 2023
End Date	July 24, 2023
Method	E-mail
<b> </b>	
Title 2	ACH Enrollment Reminder
Description 2	FSA email to borrowers who have not yet confirmed their ACH enrollment with their servicer
Audience 2	All non-default borrowers who have not confirmed as provided by servicers
Expected Date for Finalized Content	July 12, 2023
Start Date	July 18, 2023
End Date	July 18, 2023
Method	E-mail

Federal Student Aid – IDR Focus	
Title 1	Announcing SAVE



Description 1	Public announcement of new SAVE IDR plan and the new regulation changes
Audience 1	All borrowers
Expected Date for Finalized Content	July 7, 2023
Start Date	July 7, 2023
End Date	July 7, 2023
Method	Studentaid.gov/SAVE <a href="#">Instagram</a>   <a href="#">Twitter</a>   <a href="#">Facebook</a>   <a href="#">LinkedIn</a>
<b>Title 2</b>	
Description 2	Comparing the new SAVE IDR Plan to Existing IDR Plans Public announcement showing the differences between the new and existing IDR plans showing calculations and expected savings
Audience 2	All borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Social Media Posts
<b>Title 3</b>	
Description 3	IDR Forgiveness Opt Out Email Email from FSA notifying borrowers of their IDR forgiveness and the 30-day window to opt out
Audience 3	Borrowers who are going to be forgiven under IDR
Expected Date for Finalized Content	July 12, 2023
Start Date	July 14, 2023
End Date	July 14, 2023
Method	E-mail

### COMMUNICATION PAUSE FOR NEW IDR FLOW LAUNCH

FSA will be instituting a communication pause related to IDR beginning at the end of the email send on July 24, 2023. As part of this pause FSA will pause/stop communications directing borrowers to the IDR flow on studentaid.gov. This communications pause **will end on August 22, 2023**, but all servicers should wait until an email is sent from FSA informing servicers that the communications pause has been lifted. As part of this pause loan servicers should also pause/stop communications directing borrowers to the IDR flow on studentaid.gov. FSA will alert loan servicers if it is ending or extending this pause and will resume communications with the R2R focused email described in the August 2023 section.

### August 2023

<b>Federal Student Aid – R2R Focus</b>	
Title 1	Payments are resuming soon

Description 1	Focus on preparing borrowers for disclosures, billing statements, and to start making payments soon. Also encourage to sign up for auto-debit and for IDR (SAVE). Personalization made to borrowers based upon population segment.
Audience 1	At Risk
Expected Date for Finalized Content	July 28, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
<b>Title 2</b>	
Title 2	Payments are resuming soon
Description 2	Focus on preparing borrowers for disclosures, billing statements, and to start making payments soon. Also encourage to sign up for auto-debit and for IDR (SAVE). Personalization made to borrowers based upon population segment.
Audience 2	Soon to make Payments
Expected Date for Finalized Content	July 28, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
<b>Title 3</b>	
Title 3	Payments are resuming soon
Description 3	Focus on preparing borrowers for disclosures, billing statements, and to start making payments soon. Also encourage to sign up for auto-debit and for IDR (SAVE). Personalization made to borrowers based upon population segment.
Audience 3	In Previous Good Standing
Expected Date for Finalized Content	July 28, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
<b>Title 4</b>	
Title 4	Keep making your payments
Description 4	Informs borrowers who had opted out and were already making payments that they need to continue to make their payments. Inform them of the 0% interest rate ending.
Audience 4	Currently Making Payments
Expected Date for Finalized Content	July 28, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
<b>Title 5</b>	
Title 5	No payment due after the pause ends

Description 5	Inform borrowers who are expecting a full discharge of their loans or who will be entering into another forbearance or deferment that no payment will be required.
Audience 5	No Payment Due
Expected Date for Finalized Content	July 28, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
<b>Title 6</b>	
Title 6	0% interest is ending, and interest resumes 9/1
Description 6	Informs borrowers that 0% interest rate is ending, and interest will resume 9/1. Incorporates previous Fresh Start email content.
Audience 6	Borrowers in Default
Expected Date for Finalized Content	July 28, 2023
Start Date	August 7, 2023
End Date	August 11, 2023
Method	E-mail
<b>Title 7</b>	
Title 7	Reminder: Payments are resuming soon
Description 7	Additional reminder reinforcing the need for preparing borrowers for disclosures, billing statements, and to start making payments soon. Also encourage to sign up for auto-debit and for IDR (SAVE). Personalization made to borrowers based upon population segment.
Audience 7	At-Risk populations to include: <ul style="list-style-type: none"> <li>• Did not complete program of study no matter school (for profit or not for profit)</li> <li>• 30+ days delinquent immediately prior to the payment pause</li> <li>• Borrowers who rehabilitated from default or opted into Fresh Start plus and transferred to a non-default servicer</li> <li>• All remaining at-risk borrowers not in these three categories</li> </ul>
Expected Date for Finalized Content	July 28, 2023
Start Date	September 5, 2023
End Date	September 7, 2023
Method	E-mail
<b>Title 8</b>	
Title 8	External Engagement Kick Off Event
Description 8	FSA will be engaging with external partners to promote the preparation for the resumption of payments. <p>August 23, 2023 – Stakeholder call with White House Initiatives  August 24, 2023 – White House OPE Faith Community Call  TBD – K12 stakeholder call, Higher ED stakeholder call, and State/Local Partner call</p>

Audience 8	General Public
Expected Date for Finalized Content	TBD
Start Date	Week of August 21, 2023
End Date	Week of August 21, 2023
Method	External stakeholder engagement

<b>Servicer – R2R Focus</b>	
Title 1	Call Center Deflection Messaging Phase 2
Description 1	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages should be used in the servicer IVR and can be used for banner language on websites, and social media promotion in concert with FSA email campaigns
Audience 1	All Non-Default Borrowers
Expected Date for Finalized Content	July 10, 2023
Deflection Messages	See Deflection Messaging Outlines
Start Date	August 28, 2023
End Date	September 8, 2023
Method	IVR, Website, Social Media, etc.

<b>Federal Student Aid – IDR Focus</b>	
Title 1	SAVE is available – What does this mean?
Description 1	Get borrowers to the IDR application to determine which plan works for them. Ensure borrowers in REPAYE understand the changes in their payment amounts.
Audience 1	All borrowers
Expected Date for Finalized Content	July 28, 2023
Start Date	August 17, 2023 (tentative)
End Date	September 1, 2023 (tentative)
Method	SMS – content provided Social Media Updates to StudentAid.gov Video
Title 2	What does the SAVE plan mean for me?
Description 2	Two versions of an email promoting SAVE. The send on August 18 will be a test to determine which version is sent to all borrowers between August 22 and August 26
Audience 2	All Borrowers - ~200K will be sent on August 18, no send on August 21, ~4 M on August 22, ~6 M on August 24, ~6 M on August 25, and ~4 M on August 26.

Expected Date for Finalized Content	August 15, 2023 (August 18, 2023 for final formatted version of August 18 version)
Start Date	August 18, 2023
End Date	August 26, 2023 (Saturday)
Method	Email
<b>Title 3</b>	
Title 3	What does the SAVE plan mean for me?
Description 3	Let them know about the new SAVE plan and that it might be a better option for their situation than their existing IDR plan. Potentially see a lower payment amount.
Audience 3	Borrowers currently on IDR, but not REPAYE
Expected Date for Finalized Content	July 28, 2023
Start Date	August 14, 2023 (no weekend sends)
End Date	August 22, 2023
Method	Email
<b>Title 4</b>	
Title 4	What does the SAVE plan mean for me?
Description 4	Let them know about the new SAVE plan if they want to lower their monthly payment amount. Learn about benefits of SAVE.
Audience 4	Borrowers currently on the standard repayment plan
Expected Date for Finalized Content	July 28, 2023
Start Date	August 14, 2023 (no weekend sends)
End Date	August 22, 2023
Method	Email
<b>Title 5</b>	
Title 5	Comparing the new SAVE IDR Plan to Existing IDR Plans
Description 5	Public announcement showing the differences between the new and existing IDR plans showing calculations and expected savings
Audience 5	All borrowers
Expected Date for Finalized Content	To be determined
Start Date	August TBD, 2023
End Date	August TBD, 2023
Method	Social Media Posts
<b>Title 6</b>	
Title 6	Department of Education email promoting SAVE/IDR Beta launch
Description 6	Email to listserv subscribers from the Department of Education promoting SAVE/IDR Beta launch.  Daily email sends with 1 million going on August 14, 3 million on August 15, and 3 million on August 16.
Audience 6	Individuals who have subscribed to an email notification listserv at ED
Expected Date for Finalized Content	August 14, 2023

Start Date	August 14, 2023
End Date	August 16, 2023
Method	Email

## September 2023

Federal Student Aid – R2R Focus	
Title 1	Look out for your billing statement – Make sure you are prepared
Description 1	Remind borrowers that they have or will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 1	At Risk
Expected Date for Finalized Content	September 17, 2023
Start Date	September 19, 2023
End Date	September 22, 2023
Method	E-mail
<b> </b>	
Title 2	Look out for your billing statement – Make sure you are prepared
Description 2	Remind borrowers that they have or will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 2	Soon to make Payments, but only focusing on those who have never made a payment (e.g., exited grace during the pause)
Expected Date for Finalized Content	September 25, 2023
Start Date	September 29, 2023
End Date	September 30, 2023
Method	E-mail
<b> </b>	
Title 3	Look out for your billing statement – Make sure you are prepared
Description 3	Remind borrowers that they have or will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 3	In Previous Good Standing
Expected Date for Finalized Content	September 17, 2023
Start Date	September 17, 2023
End Date	September 19, 2023
Method	E-mail
<b> </b>	
Title 4	Look out for your billing statement – Make sure you are prepared

Description 4	Remind borrowers that they will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 4	Soon to make Payments, but only focusing on those that will exit grace after the payment pause
Expected Date for Finalized Content	September 17, 2023
Start Date	September 19, 2023
End Date	September 22, 2023
Method	E-mail
<b>Title 5</b>	
Description 5	Make sure you are prepared Sent to borrowers who will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 5	At-Risk populations to include: <ul style="list-style-type: none"> <li>• Did not complete program of study no matter school (for profit or not for profit)</li> <li>• 30+ days delinquent immediately prior to the payment pause</li> <li>• Borrowers who rehabilitated from default or opted into Fresh Start plus and transferred to a non-default servicer</li> <li>• All remaining at-risk borrowers not in these three categories</li> </ul>
Expected Date for Finalized Content	September 6, 2023
Start Date	September 6, 2023
End Date	September 8, 2023
Method	E-mail
<b>Title 6</b>	
Description 6	Reminder Look out for your billing statement – Make sure you are prepared Additional reminder to borrowers that they have or will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 6	At-Risk populations to include: <ul style="list-style-type: none"> <li>• Did not complete program of study no matter school (for profit or not for profit)</li> <li>• 30+ days delinquent immediately prior to the payment pause</li> <li>• Borrowers who rehabilitated from default or opted into Fresh Start plus and transferred to a non-default servicer</li> <li>• All remaining at-risk borrowers not in these three categories</li> </ul>
Expected Date for Finalized Content	September 29, 2023
Start Date	October 4, 2023
End Date	October 6, 2023
Method	E-mail

Title 7	Promotion of SAVE
Description 7	To be determined external engagement related to SAVE
Audience 7	TBD
Expected Date for Finalized Content	TBD
Start Date	September 5, 2023
End Date	September 8, 2023
Method	TBD
Title 8	R2R/SAVE Webinar
Description 8	Webinar for borrowers to provide information on R2R/SAVE
Audience 8	Those who sign up
Expected Date for Finalized Content	TBD
Start Date	September 14, 2023
End Date	September 14, 2023
Method	<a href="https://www.eventbrite.com/e/repayment-101-get-help-with-your-federal-student-loans-tickets-690231078737?aff=oddtcreator">https://www.eventbrite.com/e/repayment-101-get-help-with-your-federal-student-loans-tickets-690231078737?aff=oddtcreator</a>
Title 9	External Engagement Week of Action
Description 9	Week of engagement promoting return to repayment & SAVE
Audience 9	TBD
Expected Date for Finalized Content	TBD
Start Date	September 11, 2023
End Date	September 15, 2023
Method	TBD

Servicer – R2R Focus	
Title 1	Call Center Deflection Messaging Phase 3
Description 1	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages should be used in the servicer IVR and can be used for banner language on websites, and social media promotion in concert with FSA email campaigns
Audience 1	All Non-Default Borrowers
Expected Date for Finalized Content	July 10, 2023
Deflection Messages	See Deflection Messaging Outlines
Start Date	September 19, 2023
End Date	September 22, 2023
Method	IVR, Website, Social Media, etc.

Federal Student Aid – IDR Focus	
Title 1	SAVE is available – What does this mean?



Description 1	Get borrowers to the IDR application to determine which plan works for them. Ensure borrowers in REPAYE understand the changes in their payment amounts.
Audience 1	All borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	SMS Social Media Updates to StudentAid.gov Video

## October 2023

Federal Student Aid – R2R Focus	
Title 1	Payments have resumed
Description 1	Remind borrowers that they need to start making payments. Encourage them to seek help if they are unable to afford their first payment. Continue to encourage auto-debit and signing up for IDR (SAVE).
Audience 1	At Risk
Expected Date for Finalized Content	October 12, 2023
Start Date	October 17, 2023
End Date	October 21, 2023
Method	E-mail
<b> </b>	
Title 2	Payments have resumed
Description 2	Remind borrowers that they need to start making payments. Encourage them to seek help if they are unable to afford their first payment. Continue to encourage auto-debit and signing up for IDR (SAVE).
Audience 2	Soon to make Payments
Expected Date for Finalized Content	October 12, 2023
Start Date	October 17, 2023
End Date	October 21, 2023
Method	E-mail
<b> </b>	
Title 3	Payments have resumed
Description 3	Remind borrowers that they need to start making payments. Encourage them to seek help if they are unable to afford their first payment. Continue to encourage auto-debit and signing up for IDR (SAVE).
Audience 3	In Previous Good Standing

Expected Date for Finalized Content	October 12, 2023
Start Date	October 17, 2023
End Date	October 21, 2023
Method	E-mail

<b>Servicer – R2R Focus</b>	
Title 1	Call Center Deflection Messaging Phase 4
Description 1	FSA will be providing messaging to servicers to help with coordinated call deflection efforts to promote self-service. These messages should be used in the servicer IVR and can be used for banner language on websites, and social media promotion in concert with FSA email campaigns
Audience 1	All Non-Default Borrowers
Expected Date for Finalized Content	July 10, 2023
Deflection Messages	See Deflection Messaging Outlines
Start Date	October 17, 2023
End Date	October 21, 2023
Method	IVR, Website, Social Media, etc.

<b>Federal Student Aid – IDR Focus</b>	
Title 1	SAVE is available – What does this mean?
Description 1	Get borrowers to the IDR application to determine which plan works for them. Ensure borrowers in REPAYE understand the changes in their payment amounts.
Audience 1	All borrowers
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Social Media Updates to StudentAid.gov Video

## November 2023

<b>Federal Student Aid – IDR Focus</b>	
Title 1	What if you are having trouble making payments
Description 1	Get borrowers to the IDR application to determine which plan works for them. Provide supporting information on how to enroll and to navigate the new IDR flow. Provide information on the IDR account adjustment.

Audience 1	To be determined
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Email Social Media Posts (3-5 per month) Videos

## December 2023

Federal Student Aid – IDR Focus	
Title 1	Choose a repayment plan for your federal student loans
Description 1	Get borrowers to the IDR application to determine which plan works for them. Provide supporting information on how to enroll and to navigate the new IDR flow. Provide information on the IDR account adjustment.
Audience 1	To be determined
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Email Social Media Posts (3-5 per month)

## January 2024

Federal Student Aid – IDR Focus	
Title 1	An IDR plan may be beneficial if you have a higher balance
Description 1	Get borrowers to the IDR application to determine which plan works for them. Provide supporting information on how to enroll and to navigate the new IDR flow. Provide information on the IDR account adjustment.
Audience 1	To be determined
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Email Social Media Posts (3-5 per month) SMS

## February 2024

Federal Student Aid – IDR Focus	
Title 1	Consider an IDR Plan
Description 1	Get borrowers to the IDR application to determine which plan works for them. Provide supporting information on how to enroll and to navigate the new IDR flow. Provide information on the IDR account adjustment.
Audience 1	To be determined
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Email Social Media Posts (3-5 per month)

March 2024

Federal Student Aid – IDR Focus	
Title 1	SAVE Plan can offer you lower payments, apply today
Description 1	Get borrowers to the IDR application to determine which plan works for them. Provide supporting information on how to enroll and to navigate the new IDR flow. Provide information on the IDR account adjustment.
Audience 1	To be determined
Expected Date for Finalized Content	To be determined
Start Date	To be determined
End Date	To be determined
Method	Email Social Media Posts (3-5 per month)

## On Ramp Program In-Depth

### Program Summary

Under CR6703, servicers, to help borrowers back into repayment, will implement the Department of Education’s temporary “on ramp.” Although payments are due and interest will continue to accrue, the on-ramp will help borrowers avoid the harshest consequences of missed, partial, or late payments in the months following the end of the pause so that they do not result in negative credit reporting or default.

As part of this implementation, servicers will notify borrowers when the on-ramp forbearance is applied to their account to prevent these consequences of missed, partial, or late payments. FSA will be providing to servicers a copy of the message to use as outlined in CR6703 and some Frequently Asked Questions to help customer service representatives answer questions about the program and what it means for their student loans.

Communications around this on-ramp will continue until the program is ended as described in CR6703.

## Messaging for Servicer Comms

On July 18, 2023, FSA provided servicer talking points for their customer service representatives to use if they receive questions related to On Ramp. Beyond these talking points servicer communications **should not** reference On Ramp.\* The only exception is if servicers have an existing system message that discusses the consequences of missed, late, or partial payments, such as negative credit reporting. In these existing system messages, the following statement should be added (per requirement 8 of CR6703) to ensure borrowers are aware that they will not be subjected to these consequences.

### CONSEQUENCES OF DELINQUENCY DURING ON RAMP PERIOD

Normally if you miss three monthly payments, your loan(s) would be considered delinquent and reported to the national credit reporting agencies. However, the U.S. Department of Education has created a temporary on-ramp period to support you as you start or restart payments following the pandemic pause. As part of the on-ramp, if you miss too many payments we will apply a forbearance to your student loan account for the payments you missed.

Here's what this means:

- Your account will no longer be considered delinquent and will be made current.
- Your recent missed payments will not lead to negative credit reporting.
- Your loans are not being sent to collection agencies.

However, interest has accrued during these months of missed payments and your monthly payments may increase to account for the accrued interest.

## Clarification on Requirement 8 on CR6703

\*Note: While requirement 8 states "All Borrower Facing Communications" this language should only be added to existing system messages that discusses the consequences of missed, late, or partial payments, such as negative credit reporting. All other communications channels (IVR, website, text messages, etc.) **should not** reference On Ramp unless explicit instruction is provided by FSA to do so, such as the below:

1. For those parts of servicer websites that do reference the consequences of missed, late, or partial payments, those should be removed until the On Ramp period ends.

## Targeted Early Delinquency Intervention (TEDI) Program In-Depth

### Program Summary

As announced, FSA has put together an always-on communication approach to conduct outreach to borrowers in At Risk categories. Also known as TEDI, the goal of this program is for FSA to communicate with these borrowers based upon their behavior once payments resume in 2023. The messages to be sent to these borrowers are as follows:

1. For borrowers in the TEDI audience who successfully make their student loan payment on time, FSA will send an email message of support before their next payment is due (1 email randomly assigned or no email at all).

2. For borrowers in the TEDI audience who miss their student loan payment, FSA will send a message providing information on how to get support and the risks of remaining delinquent before their next payment is due (10 different messages randomly assigned).

Beyond this originally identified segment of borrowers, FSA will add in borrowers over time whom we did not consider “At Risk” but miss a payment after payments resume. FSA will send these borrowers a message providing information on how to get support and the risks of remaining delinquent before their next payment is due.

Finally, borrowers who are in the At-Risk audience who successfully make 3 consecutive months of payments will then be removed from the TEDI email send population. If, subsequently, they miss a payment after being removed, they would return into TEDI to receive outreach from FSA.

FSA intends to send emails at a regular cadence throughout the month with an initial goal of emails being sent to borrowers no later than 15 days after they make or miss a payment. For example, if a borrower had a payment due on October 10, 2023, they should expect to receive a tailored email from FSA no later than October 25, 2023. This will allow enough time for the borrower to react to the message before their next payment is due in November 2023.

### Role of Servicers in Relationship to TEDI

Beyond TEDI, servicers should conduct outreach efforts based upon the understanding of their borrower population and outreach capabilities. FSA will not prescribe the content, type, and frequency of outreach done by servicers, but may request samples or information on the status of outreach being conducted by servicers to help modify future FSA messaging to this population as the TEDI program matures.

## Planned Vendor Communications Beyond This Plan

Servicers are also encouraged to send additional communication or correspondence to borrowers related to the ending of the extension period. If a servicer intends to do additional communication or correspondence, FSA is asking to see the following:

1. Documentation of their communications plan/approach to ending of the payment pause.
  - a. This should include planned communications such as inserts, additional emails, SMS, website updates, etc.
  - b. This should not include mandatory communications (e.g., disclosure notices and billing statements)
2. Planned communications, which FSA may review and provide feedback.

Upon review of the plan and provided communications, FSA will provide feedback. After this feedback is provided, servicers can use this feedback to craft additional communications and messages if so desired.

Servicers should ensure the following when drafting and releasing additional communication as it relates to their plan:

1. Follows all applicable laws and regulations to include borrower’s agreement to receive such communication via the format intended (e.g., SMS).

2. Reflects guidance and/or content that can be found on StudentAid.gov OR within CR5505 and all subsequent extension CR Questions & Answers.
3. Uses previously issued communication as an example of accepted language.
4. If servicers are unsure regarding the accuracy of the authored content, or would like FSA to review content at any point in time, they should connect with their liaison and cc the [FSACaresActComms@ed.gov](mailto:FSACaresActComms@ed.gov) email box to discuss and review before releasing to borrowers.

Servicers are asked to provide their plan and communications to [FSACaresActComms@ed.gov](mailto:FSACaresActComms@ed.gov) for review.

Provided communications plans and/or content should follow this email template below:

- Vendor Name.
- Primary Vendor Point of Contact Name, Email, and Phone Number.
- Secondary Vendor Point of Contact Name, Email, and Phone Number.
- Summarized Description of Content (Including the Two Example Messages for the Initial Review).
- Intended Borrower Audiences the Entire Plan or Communication Intends to Reach (see the examples FSA is using above).
- Date the Plan/Communication will be Implemented by the Servicer.

## Website Content

Servicers will be notified as soon as possible when FSA updates StudentAid.gov content related to the ending of benefits, SDR, and IDR. Servicers should ensure that their website content accurately reflects the content on StudentAid.gov for all associated topics. If they have questions on such topics, they should confirm content with FSA via the [FSACaresActComms@ed.gov](mailto:FSACaresActComms@ed.gov) mailbox.

## Reporting Requirements

It is expected that servicers may be asked from time to time to provide data on the success of their communication outreach. Possible data could be, but is not limited to:

- Confirmation the communications have been sent.
- Evidence and tracking of all undeliverable email and postal mail for each communication sent per borrower to demonstrate each attempt made to reach the borrower.
- Social media engagement metrics.
- Open rates as it relates to email communication.
- Calls to action success (update contact information, IDR sign up, etc.)

FSA will reach out to servicers requesting updates on campaign or communication success based upon the provided communication plan.

## Deflection Messaging Outlines

To sync up certain messaging during the return to repayment period, FSA is providing for non-default servicers, a series of messages to use in coordination with our monthly email campaigns. The Servicer

Key message is the message FSA would like played immediately at the top of a servicer’s IVR before a borrower is given different options or choices. The Servicer Hold messages are additional statements that FSA would like to be played if a borrower is on hold waiting to talk with a CSR.

Servicers may recommend edits to these messages if they are provided for review and approval to FSA via the [FSACaresActComms@ed.gov](mailto:FSACaresActComms@ed.gov) mailbox.

For Perkins borrowers, the Perkins servicer may alter/change the messages as needed to reflect that Perkins borrowers are unable to sign up for IDR. For defaulted borrowers, focus should remain on Fresh Start and other agreed upon talking points in consultation with FSA.

### Phase 1

Phase 1 deflection messaging has already been provided with the resulting debt limit increase legislation passing and the Supreme Court decision on debt relief. Details on these messages can be referenced earlier in this document.

### Phase 2

Message Type	Messaging
Servicer Key	Student loan interest will resume starting on September 1, 2023, and payments will be due starting in October. To prepare for your first bill, consider signing up for the new income-driven repayment plan, SAVE, before September. An income-driven repayment plan could make your payments more affordable. Visit <a href="http://StudentAid.gov/SAVE">StudentAid.gov/SAVE</a> for more information or <a href="http://StudentAid.gov/IDR">StudentAid.gov/IDR</a> to sign up.  If you have more questions about payments restarting, visit <a href="http://StudentAid.gov/restart">StudentAid.gov/restart</a>
Servicer Hold	To prepare for your first bill, consider signing up for the new income-driven repayment plan, SAVE, before September. An income-driven repayment plan could make your payments more affordable. When you sign up, you can pick the plan with the lowest monthly payment amount for you. Visit <a href="http://StudentAid.gov/IDR">StudentAid.gov/IDR</a> to enroll.
Servicer Hold	Student loan interest will resume starting on September 1, 2023, and payments will be due starting in October. Sign up for [SERVICER NAME FOR AUTO DEBIT] to make sure you don’t miss your first payment. [SERVICER NAME FOR AUTO DEBIT] gives you a .25% reduction in your interest rate, which will lower your total amount paid. To sign up, visit [INSERT WEBSITE] and log in to your account.
Servicer Hold	Student loan interest will resume starting on September 1, 2023, and payments will be due starting in October. [SERVICER NAME] will send you your billing statement [NUMBER OF DAYS] before your payment is due in October. To make sure you don’t miss your billing statement, log in to [INSERT WEBSITE] to make sure your contact information is up to date.
Servicer Hold	Were you recently transferred to [SERVICER NAME] or are you new to [SERVICER NAME]? Create an account on [INSERT WEBSITE]. If you already have an account but have forgotten your password, you can easily reset it on [INSERT WEBSITE].

### Phase 3

Message Type	Messaging
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Servicer Key	<p>The payment pause has ended, and you'll get your billing statements soon. Can't afford your monthly payment? Consider signing up for the new income-driven repayment plan, SAVE, now. Visit <a href="http://StudentAid.gov/SAVE">StudentAid.gov/SAVE</a> for more information or <a href="http://StudentAid.gov/IDR">StudentAid.gov/IDR</a> to sign up.</p> <p>If you're ready to make a payment, visit [SERVICER WEBSITE] and log in to your account.</p> <p>If you have more questions about payments restarting, visit <a href="http://StudentAid.gov/restart">StudentAid.gov/restart</a>.</p>
Servicer Hold	<p>You should have gotten your billing statement, or you'll get it soon. Can't afford your monthly payment? Consider signing up for the new income-driven repayment plan, SAVE. When you sign up, you can pick the plan with the lowest monthly payment amount for you. Visit <a href="http://StudentAid.gov/IDR">StudentAid.gov/IDR</a> to sign up.</p>
Servicer Hold	<p>Sign up for [SERVICER NAME FOR AUTO DEBIT] to make sure you don't miss your first payment. [SERVICER NAME FOR AUTO DEBIT] gives you a .25% reduction in your interest rate, which will lower your total amount paid. To sign up, visit [INSERT WEBSITE] and log in to your account.</p>
Servicer Hold	<p>Have questions about the payment pause ending? Visit the official webpage for preparing for student loan payments to restart at <a href="http://StudentAid.gov/restart">StudentAid.gov/restart</a>.</p>
Servicer Hold	<p>If you're ready to make a payment, visit [SERVICER WEBSITE] and log in to your account.</p>
Servicer Hold	<p>Were you recently transferred to [SERVICER NAME] or are you are new to [SERVICER NAME]? Create an account on [INSERT WEBSITE]. If you already have an account but forgot your password, you can easily reset it on [INSERT WEBSITE].</p>

#### Phase 4

Message Type	Messaging
Servicer Key	<p>Your first student loan payment is due in October. Can't afford your monthly payment? Consider signing up for the new income-driven repayment plan, SAVE, which could lower your payment. Visit <a href="http://StudentAid.gov/SAVE">StudentAid.gov/SAVE</a> for more information or <a href="http://StudentAid.gov/IDR">StudentAid.gov/IDR</a> to sign up.</p> <p>If you're ready to make a payment, visit [SERVICER WEBSITE] and log in to your account.</p> <p>If you have more questions about payments restarting, visit <a href="http://StudentAid.gov/restart">StudentAid.gov/restart</a>.</p>
Servicer Hold	<p>If you're ready to make a payment, visit [SERVICER WEBSITE] and log in to your account or [SERVICER INSTRUCTIONS] to pay over the phone.</p>
Servicer Hold	<p>Your first student loan payment is due in October. Can't afford your monthly payment? Consider signing up for the new income-driven repayment plan, SAVE. When you sign up, you can pick the plan with the lowest monthly payment amount for you. Visit <a href="http://StudentAid.gov/IDR">StudentAid.gov/IDR</a> to sign up.</p>

Servicer Hold	Sign up for [SERVICER NAME FOR AUTO DEBIT] to make sure you don't miss your first payment. [SERVICER NAME FOR AUTO DEBIT] gives you a .25% reduction in your interest rate, which will lower your total amount paid. To sign up, visit [INSERT WEBSITE] and login to your account.
Servicer Hold	Have questions about the payment pause ending? Visit the official webpage for preparing for student loan payments to restart at <a href="https://StudentAid.gov/restart">StudentAid.gov/restart</a>
Servicer Hold	Were you recently transferred to [SERVICER NAME] or are you new to [SERVICER NAME]? Create an account on [INSERT WEBSITE]. If you already have an account but forgot your password, you can easily reset it on [INSERT WEBSITE].

## Version Control

Version	Description	Date
1	Original Version	7/3/2023
2	Updated July email send to reflect additional email Updated dates for ACH Email	7/3/2023
3	Updating send dates for July SDR email, deleting out June SDR email, which was a duplicate of the July SDR email, and updating that deflection will focus on non-default borrowers	7/6/2023
4	Updated email send dates for July	7/7/2023
5	Updated email send dates for July & added in deflection messaging for the remainder of the R2R period	7/11/2023
6	Added details on IDR Forgiveness Opt Out Email	7/12/2023
7	Added details on the IDR Communications Pause	7/14/2023
8	Updated send dates for August and shifted IDR communication from July to August. Reflected early July social media postings related to SAVE	7/18/2023
9	Clarified deflection messaging and updated send dates for August communications to TBD.	7/27/2023
10	Updated August send dates for email communications and added Phase 2 deflection dates to align	7/28/2023
11	Updated some information on phase 1 deflection and added external engagement actions in August and September	8/4/2023
12	Updated IDR Comms Pause tentative end date, August and September email send dates, and updated deflection messaging dates in August and September	8/9/2023
13	Updated guidance related to On Ramp, the communications pause, and beta email send dates	8/10/2023
14	Updated send dates for remaining August emails and updated IDR communications pause tentative end date	8/15/2023
15	Updated information on Auto Debit disenrollment related to CR5881, date for IDR comms pause end, and August FSA SAVE email send information	8/16/2023
16	Updated information on August send dates and ending of IDR comms pause	8/18/2023
17	Updated details on the external engagement outreach expected the week of August 21, 2023. Also updated call deflection phase 2 dates to align with FSAs R2R email send from August 28 to September 7	8/21/2023
18	Added update on when ACH disenrollment must begin at all servicers, which is August 28, 2023	8/21/2023
19	Updates to some details related to external engagement in September	8/23/2023
20	Updates to Deflection messages around ACH	8/30/2023
21	Updates to September send dates and dates around phase 2 and 3 of deflection timing	9/6/2023
22	Updates to September content delivery dates	9/17/2023

23	Updates to September and October email send dates	9/21/2023
24	Updated send end date for Sept 29 email	9/28/2023

# maximus

October 11, 2023

The Honorable Elizabeth Warren  
309 Hart Senate Office Building  
Washington, D.C. 20510

The Honorable Chris Van Hollen  
730 Hart Senate Office Building  
Washington, D.C. 20510

The Honorable Richard Blumenthal  
706 Hart Senate Office Building  
Washington, DC 20510

The Honorable Edward Markey  
255 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Senator Warren, Senator Blumenthal, Senator Van Hollen, and Senator Markey:

Thank you for your letter dated September 27, 2023. We appreciate the opportunity to answer your questions for Maximus Education, LLC, doing business as Aidvantage for the Department of Education (DoED) Office of Federal Student Aid (FSA), as we continue to support borrowers during the resumption of student loan payments.

Aidvantage works directly for FSA to communicate information to borrowers regarding return to repayment readiness. That information and how we communicate, is developed in collaboration with FSA, as new implementation plans, and borrower requirements are rolled out by FSA. In this role, our goal is to follow FSA direction as we provide the best service to the borrowers.

We understand that the resumption of student loan payments is unique in student loan servicing history. Accordingly, Maximus began planning, in coordination with FSA, well in advance of payment resumption. These efforts include:

- Both general and targeted outreach and emails to borrowers, supplementing those required by FSA.
- Proactive educational videos, available on YouTube and promoted through social media, informing borrowers of their rights and options.
- Updates to web pages and introduction of new Web Chat features to help borrowers prepare.
- Coordinated enhanced staffing with FSA to manage anticipated higher call volumes.

Maximus continues to work collaboratively with FSA to respond to these unprecedented times and enhance our ability to assist borrowers within FSA's limitations. This collaboration includes reviews of processing demands and improvements to the efficiency and speed of both processing and borrower engagement.

Maximus is steadfast in our effort to support borrowers and Federal Student Aid as we collectively navigate this unique period in student loan history.

Sincerely,



**Bruce Caswell**  
President and Chief Executive Officer, Maximus, Inc.



**Teresa Weipert**  
General Manager and President, Maximus Federal Services, Inc.

*The answers to the questions requested are detailed below. The data presented is drawn from the period of September 1, 2023 through September 22, 2023.*

## Questions/Responses

### 1) What is the current average call wait time for borrowers before they are transferred to a customer service representative at your company?

While call volume from borrowers has been within 6% of our forecast, the time we spend on the phone with an average borrower (Average Handle Time) has increased by as much as 45%, which leads to longer wait times for subsequent borrowers. We understand how challenging this time is for all our borrowers and so we take time to not only answer their questions fully but provide proactive care to prepare them for their next steps. This results in superior borrower experience and provides as much information as needed so the borrower does not have to call back. These increases in call volume and Average Handle time currently result in an average call wait time of 28 minutes and 56 seconds.

#### a) What percent of borrowers that are placed on hold hang up before they speak with a company representative?

From September 1-22, 2023, 48.2% of callers hung up before speaking with a company representative.

#### b) What is your current call abandonment rate?

Answer is provided in (a) above.

### 2) How many steps does it take a borrower to navigate your Interactive Voice Response (IVR) menu from the time a call is connected until they are able to select an option to speak with a representative?

Requesting to speak to a representative can be accomplished in 2 steps.

#### a) How many minutes does it take a borrower, on average, to navigate your IVR and select an option to speak with a representative?

1 minute, 52 seconds.

#### b) Is the time it takes to navigate your IVR and select an option to speak with a representative included in the average call wait time metric provided in question #1?

No, wait time starts once they transfer out of the IVR.

*i) If no, please provide an additional response that indicates the total amount of time, on average, it takes for a borrower to reach a representative at your company.*

30 minutes, 48 seconds. (28 minutes, 56 seconds plus 1 minute, 52 seconds)

#### c) Is the time it takes to navigate your IVR and select an option to speak with a representative included in the abandon rate metric provided in question #1b?

No.

*i) If no, please provide an additional response that indicates the total share of borrowers who contact your company but hang up before successfully navigating your IVR?*

Our IVR, and overall system, is designed to improve the borrower experience by providing as many options as possible for resolving their questions and concerns. Many borrowers can fully self-serve



within the IVR or choose to go to our website for additional information. Overall, 22.6% of callers self-serve and conclude within the IVR. The remaining borrowers are directed to an agent for additional assistance.

d) Have the number of steps changed in the past 12 months and, if so, how?

No, we keep the number of steps to speak to a representative to a minimum.

**3) What is the current average email response time for borrowers trying to get in touch with your company?**

11 business days.

**4) How many borrowers have been transferred to you through the Department's Fresh Start initiative?**

We respectfully suggest that questions specifically regarding borrower status (including Fresh Start and IDR status) be directed to FSA for full and complete counts across all servicers.

a) Describe the specific outreach you have made to borrowers transferred to you through Fresh Start. How many of these borrowers have responded to your outreach?

b) How many of these borrowers have been placed in an IDR plan?

c) How many of these borrowers have set up an account with your company?

d) How many of these borrowers have you made successful contact with?

**5) For each of the following months, what is your projected average and maximum call and email communication wait times?**

a) October

b) November

c) December

Aidvantage has not, at this juncture, forecasted average wait times for call communications for these three months. Email communication projected wait times for October are 11-12 business days, for November are 9-10 business days, and for December are 5 business days.

**6) If you offer scheduled callbacks, how many hours is the average borrower having to wait to get a callback?**

To utilize staff in the most efficient way to support borrower inquiries, no callback is currently offered.



**7) How many borrowers have complained about errors in calculating their monthly payment amounts?**

Aidvantage has received 11 complaints regarding monthly payment amounts. None of these, upon review, were the result of any calculation errors.

**a) What steps do you take to ensure borrowers' monthly payments were calculated appropriately?**

When calculating monthly payments, we operate at the direction of FSA and follow their requirements and process.

In responding to the complaints indicated above, Aidvantage assisted borrowers with understanding information related to repayment programs and due dates and the status of pending IDR applications.

**8) What percentage of your staff are fully trained and responding to borrower inquiries?**

100%.

**9) What guidance are you receiving from the Department of Education regarding customer service quality assurance in the context of return to repayment?**

We respectfully suggest that questions regarding customer service quality assurance be directed to FSA.

**10) What is your most recent Service Level Agreements (SLA) performance score for the following metrics?**

**a) Customer Satisfaction**

FSA conducts third-party Customer Satisfaction surveys and retains the data for all servicers. We respectfully suggest that questions regarding Customer Satisfaction be directed to FSA.

**b) Interaction Quality Monitoring**

95.81% out of 100.

**c) Accuracy rate.**

N/A – this is not currently being measured by the FSA.

**11) What guidance are you receiving from the Department of Education regarding how to report missed student loan payments to credit reporting agencies during the on-ramp?**

As directed by FSA via the on-ramp program, borrower missed payments will not be reported to credit reporting agencies during the on-ramp period.

**a) What do you report to credit reporting agencies if a borrower misses monthly payments during the on-ramp?**

Per Federal Student Aid guidance, during the “On Ramp” period, Aidvantage will not report any borrower delinquent. If a borrower misses any monthly payments, Aidvantage will clear that delinquency before it reports out on the 90-day mark with an administrative forbearance. Aidvantage will report the account as deferred to the credit reporting agencies with:





- A Monthly Payment Amount of \$0
- A Scheduled Monthly Payment of \$0
- An amount past due of \$0
- No delinquency
- A Terms Frequency of 'D' (deferred)
- The Account Status code of '11' (current)
- The Payment History Profile will be 'D' to indicate accounts that were previously in repayment but are now deferred.

b) What are you telling borrowers regarding the consequences of missed payments during the on-ramp?

At the direction of FSA, as represented in the attached “Playbook,” we instruct borrowers that if they can make payments, they should do so. Please see Appendix A for Question and Answers provided by Federal Student Aid.

**12) How many borrowers have been transferred to your company since February 1, 2020?**

Aidvantage did not service borrowers on February 1, 2020.

Aidvantage has 9,008,308 current borrowers that were all transferred in since October 2021.

a) How many of these borrowers have you made successful contact with?

We have sent communications to all current borrowers.

b) How many of these borrowers have set up an account with your company?

6,011,861 of the total borrowers we manage have an online account. We expect more will complete this step over the next few months.

**13) Describe the outreach to the over 2.5 million ED-backed FFEL borrowers about the benefits and risks of loan consolidation.**

Information is provided on our web site regarding Loan Consolidation considerations and borrowers are directed to studentaid.gov for additional information.

**14) Please provide the most recent version of the Return to Repayment, Student Debt Relief, and Income Driven Repayment New Communication Playbook.**

Version 24 received 9/28/2023.



FSA Return to  
Repayment New Communication

## Appendix A FSA ON-RAMP – Question and Answers

### QUESTIONS & ANSWERS REGARDING THE ON-RAMP ADMINISTRATIVE FORBEARANCE

#### **Q: What is on-ramp?**

**A:** Under legislation enacted by Congress, the student loan payment pause is ending and interest will begin accruing on September 1, and payments will be due in October. To help borrowers successfully return to repayment, the Department has created a temporary on-ramp to protect borrowers from the worst consequences of missed, late, or partial payments, such as negative credit reporting. However, borrowers who can make their payments should do so.

#### **Q: What additional flexibilities does the on-ramp transition period allow?**

**A:** Borrowers who can make their payments should do so. Borrowers unable to afford their payment should explore income-driven repayments plans, especially SAVE. However, for any borrower 90+ days delinquent who would be reported negatively to the credit bureaus,

- a retroactive administrative forbearance will be added,
- the account will no longer be considered delinquent, and
- negative credit reporting will not occur.

#### **Q: What action does a borrower need to take to be eligible for the retroactive forbearance during the on-ramp transition period?**

**A:** Borrowers who can make their payments should do so. If one or multiple payments are missed Servicers will evaluate any borrower 90+ days delinquent that would be reported negatively (delinquent) to the credit bureaus, add an administrative forbearance for the entire delinquency period, which will prevent any negative credit reporting from occurring.

#### **Q: What type of forbearance will be applied during the on-ramp transition period?**

**A:** An administrative forbearance will be applied.

#### **Q: Will the interest rate be set to zero during the on-ramp transition period?**

**A:** No. Payments are still due, and interest will continue to accrue.

#### **Q: Will unpaid interest capitalize at the end of the on-ramp transition period?**

**A:** No. Unpaid interest will not capitalize at the end of this on-ramp transition period. Even so, borrowers will be responsible for paying this additional interest balance first before paying their principal loan balance.

Servicers also may be required to amortize this additional interest balance into borrowers' monthly payment in the future so that the borrowers' loans will be paid off on time. If so, servicers will send to borrowers a notice of the amortization and the changed monthly payment amount.

#### **Q: How long is the duration of the on-ramp transition period?**

**A:** This on-ramp transition period will start on October 1, 2023, and last for one year ending on September 30, 2024.



**Q: Will months for which the retroactive forbearance is applied count toward PSLF and/or IDR loan forgiveness?**

**A:** No. Borrowers will not receive credit toward PSLF and/or IDR loan forgiveness if a retroactive forbearance is applied during the on-ramp transition period. Borrowers are encouraged to get onto an IDR repayment plan ([StudentAid.gov/idr](https://StudentAid.gov/idr)), such as SAVE ([StudentAid.gov/save](https://StudentAid.gov/save)), and into a regular payment pattern on that plan so payments will count toward forgiveness.

**Q: Will months for which the retroactive forbearance is applied be considered under the Payment Count Adjustments toward the previously announced IDR Account Adjustment?**

**A:** The IDR Account Adjustment corrects for periods of past extended forbearances. Any time in forbearance effective after the end of the COVID-19 payment pause but before we make the one-time adjust in 2024 will contribute to a borrower's 12- or 36-month forbearance thresholds.

**Q: How will the servicers notify borrowers of the details of the on-ramp transition period or application of the retroactive forbearance?**

**A:** Borrowers will be notified via direct email or postal mail (their preferred communication method) that they were retroactively placed into the On-Ramp administrative forbearance.

**Q: Can a borrower request the on-ramp forbearance?**

**A:** No. Borrowers who can make their payments should do so and if they are unable to afford their payment should explore income-driven repayments plans, especially SAVE. The on-ramp forbearance is a tool ED will use to help borrowers transition back into a regular payment pattern and prevent negative credit reporting consequences during the transition period.

