

Federal Student Loans: How Education Has Communicated with Borrowers about Resuming Payments

GAO-25-107111 (Accessible Version)

Q&A Report to the Ranking Member, Committee on Education and the Workforce, House of Representatives

October 10, 2024

Why This Matters

Federal student loans are an important resource to help millions of individuals pay for higher education. As of March 2024, the Department of Education held \$1.5 trillion in outstanding William D. Ford Federal Direct Loans and Federal Family Education Loans for nearly 45 million borrowers.

In March 2020, in response to the COVID-19 pandemic, Education implemented relief for borrowers, which paused several aspects of student loan repayment including payments being due and interest accrual. After several extensions of the payment pause, interest began accruing on loans again in September 2023, and borrowers' monthly loan payments resumed in October 2023, according to Education. To assist borrowers who may struggle to make payments, Education introduced a new loan repayment plan, as well as temporary relief options that ended in fall 2024. As of January 2024, about half of student loan borrowers in repayment (17.8 million) were current on their loan payments, according to Education data.

Education is responsible for communicating with borrowers about student loan repayment, and it has contracts with loan servicers to help with some communications, including billing statements and information about repayment and forgiveness options. After the 3½-year payment pause, many existing borrowers were out of the habit of paying regularly, and the newest borrowers (among them students who graduated during the payment pause period) were making a student loan payment for the first time, according to Education officials.

This report provides information on how Education communicated with borrowers about resuming student loan payments and temporary relief options.

Key Takeaways

- Beginning in July 2023, Education communicated information to borrowers about resuming student loan payments and the availability of temporary relief options, using methods such as emails, letters, text messages, social media posts, and its website, StudentAid.gov.
- Education began implementing a plan for communicating with borrowers about the end of temporary relief options, with communications beginning in June 2024 and lasting through fall 2024.

What was the student loan payment pause?

In response to the COVID-19 pandemic, Education implemented a student loan payment pause under the CARES Act and related administrative actions to provide relief to borrowers.¹ Starting in March 2020, it suspended loan payments due, interest accrual, and involuntary collections on loans in default.² After several extensions, this payment pause ended in August 2023 as required by the Fiscal Responsibility Act of 2023.³

How did Education communicate with borrowers about resuming payments?

Education used a variety of methods to communicate with borrowers about resuming student loan payments, including emails, text messages, social media posts, and its website, StudentAid.gov. All of Education's communications referred borrowers to use StudentAid.gov as the primary source of information about resuming student loan payments.

From July 2023 through October 2023, Education sent monthly emails to borrowers notifying them about the end of the payment pause and resumption of monthly payment requirements. For example, in July 2023, Education sent emails notifying borrowers that interest would begin accruing in September 2023 and monthly payments would resume in October 2023. In August 2023 and September 2023, Education sent emails with information on upcoming deadlines and steps borrowers should take to prepare for the resumption of monthly payments. The August and September 2023 emails included links to Education's website that borrowers could use to update their contact information, identify their loan servicer, and learn about and enroll in affordable repayment plans. Education also provided borrowers with information on auto pay, an option that allows borrowers to have their monthly payments automatically debited from their bank account.

Education customized some of its email content for borrowers. For example, some of Education's emails included a link that borrowers could click on to go to their specific loan servicer's website. Education also targeted some outreach to borrowers it determined were more at risk of late or missed payments based on their prior payment histories and other characteristics. For example, Education considered a borrower "at risk" if they:

- were late on loan payments before the payment pause began,
- entered repayment for the first time after the payment pause began,
- returned their defaulted loans to good standing during the payment pause, or
- recently had their loans transferred to a new loan servicer.

Education officials said that while they attempted to identify borrowers who could be most at-risk based upon historical characteristics and payment patterns, they considered all borrowers resuming payment after the 3½ -year payment pause to be at some degree of risk for late or missed payments.

Education sent additional monthly emails from July 2023 to October 2023 to borrowers it determined to be most at risk. Education officials told us they sent

these additional communications to reduce at-risk borrowers' chance of becoming past due on loan payments.⁴

Loan servicers also communicated with borrowers via the same methods mentioned above—emails, text messages, websites, and social media. In addition, all four loan servicers included information about repayment options on borrowers' monthly billing statements, which Education officials said was important so borrowers could quickly see available options if they needed help. Education officials and all four servicers stated that they ask borrowers their communication preference and communicate with them using that preferred method.

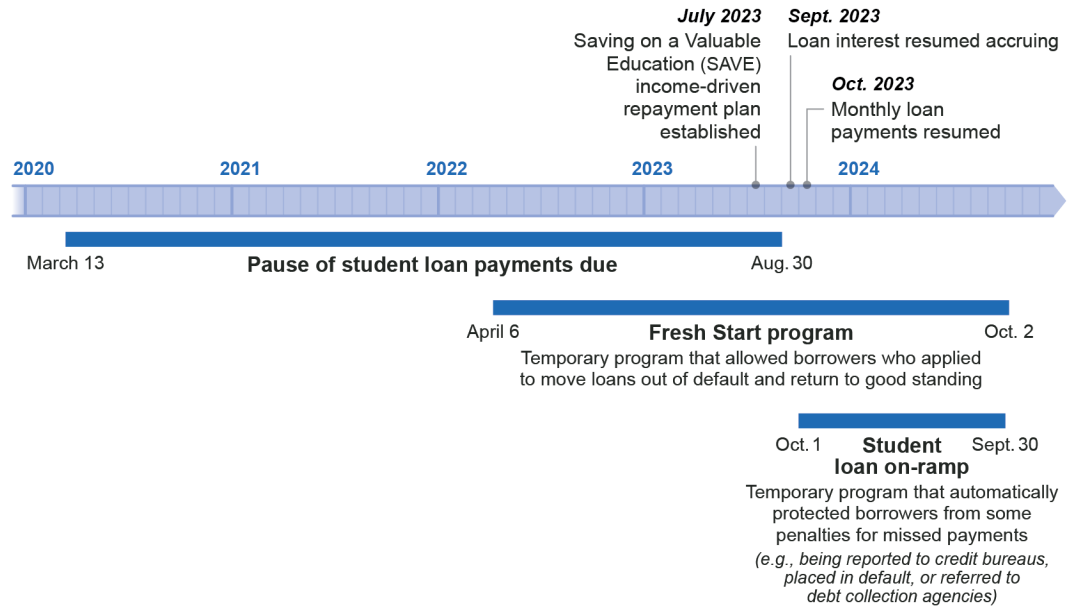
What options has Education introduced to help borrowers resume payments?

Education introduced a new repayment plan and two temporary relief options to help borrowers resume monthly student loan payments (see fig. 1).

- **The Saving on a Valuable Education (SAVE) plan.** This is an income-driven repayment plan. Borrowers who use income-driven repayment plans make monthly student loan payments that are based on their specific income and family size.⁵ Like other income-driven repayment plans, the SAVE plan offers forgiveness of the borrower's remaining loan balance at the end of the repayment period. In addition, the SAVE plan generally offers borrowers lower monthly payments because Education sets the payments based on a smaller proportion of the borrower's income, compared to other income-driven repayment plans.⁶
- In July 2023, Education implemented a new income-driven repayment application on StudentAid.gov to make it easier for borrowers to enroll in SAVE and other income-driven repayment plans. Borrowers could apply directly without needing to contact their loan servicer, using an online application that Education estimated would take borrowers about 10 minutes to complete.⁷ On July 18, 2024, the U.S. Court of Appeals for the Eighth Circuit (Eighth Circuit) granted an emergency motion for a stay, which temporarily prohibited Education from implementing the SAVE plan. On July 19, 2024, Education announced that borrowers enrolled in the SAVE plan would be placed in an interest-free forbearance while the litigation was ongoing.⁸ Education also announced that the online application was temporarily unavailable as a result of the stay.⁹ Subsequently, on August 9, 2024, the Eighth Circuit issued an injunction that superseded the stay and prohibited Education from implementing the SAVE plan until further order of the Eighth Circuit or the U.S. Supreme Court. On August 28, 2024, the U.S. Supreme Court denied a request to vacate the Eighth Circuit injunction, leaving the injunction in place.¹⁰
- **The “on-ramp” transition period.** Education instituted a 12-month “on-ramp” period that allowed borrowers to avoid negative consequences of late or missed payments, but only during this 1-year period. The on-ramp was designed to help ease borrowers back into regular repayment status. The on-ramp started on October 1, 2023, and ended on September 30, 2024. Borrowers who missed monthly payments during this period would not be reported to credit bureaus, placed in default, or referred to debt collection agencies. However, interest on loans would continue to accrue as normal, which could result in increased monthly payment amounts.¹¹ These protections were provided automatically to borrowers who missed payments; borrowers did not need to apply to benefit.

- **Fresh Start.** This was another temporary relief program that Education started on April 6, 2022, and was scheduled to end on September 30, 2024. This program allowed borrowers with defaulted loans to restore them to good standing. Education returns the defaulted loans of participating borrowers to repayment status and removes the record of default from borrowers' credit reports. These borrowers also gain access to income-driven repayment plans like SAVE and to postponement options like loan deferment or forbearance that can help them manage repayment, as well as the ability to receive additional federal student aid.¹² Borrowers had to apply to get their loans out of default through the Fresh Start program and to access the program's benefits. On September 30, 2024, Education announced it was extending the Fresh Start enrollment period to October 2, 2024.¹³

Figure 1: Timeline of Education’s Student Loan Payment Pause, New Loan Repayment Plan, and Temporary Relief Options, 2020–2024



Source: Department of Education information. | GAO-25-107111

Accessible Data for Figure 1: Timeline of Education’s Student Loan Payment Pause, New Loan Repayment Plan, and Temporary Relief Options, 2020–2024

- **July 2023:** Saving on a Valuable Education (SAVE) income-driven repayment plan established
- **Sept. 2023:** Loan interest resumed accruing
- **Oct. 2023:** Monthly loan payments resumed
- **Pause of student loan payments due:** March 13 to Aug.30
- **Fresh Start program** (Temporary program that allowed borrowers who applied to move loans out of default and return to good standing): April 6 to Oct. 2
- **Student loan on-ramp** (Temporary program that automatically protected borrowers from some penalties for missed payments; e.g., being reported to credit bureaus, placed in default, or referred to debt collection agencies): Oct. 1 to Sept.30

Source: Department of Education information. | GAO-25-107111

How has Education communicated with borrowers about temporary loan relief?

Education has provided information to borrowers about temporary loan relief available to borrowers who miss payments or have defaulted loans. For example, Education has provided this information via its website and through email and postal mail.

Temporary relief for borrowers who miss payments. Education included information about the 12-month on-ramp and its end date on several webpages on StudentAid.gov, including webpages titled “Restarting Student Loan Payments,” “Repaying Student Loans for the First Time,” and “Federal Student Loan Debt Relief.”

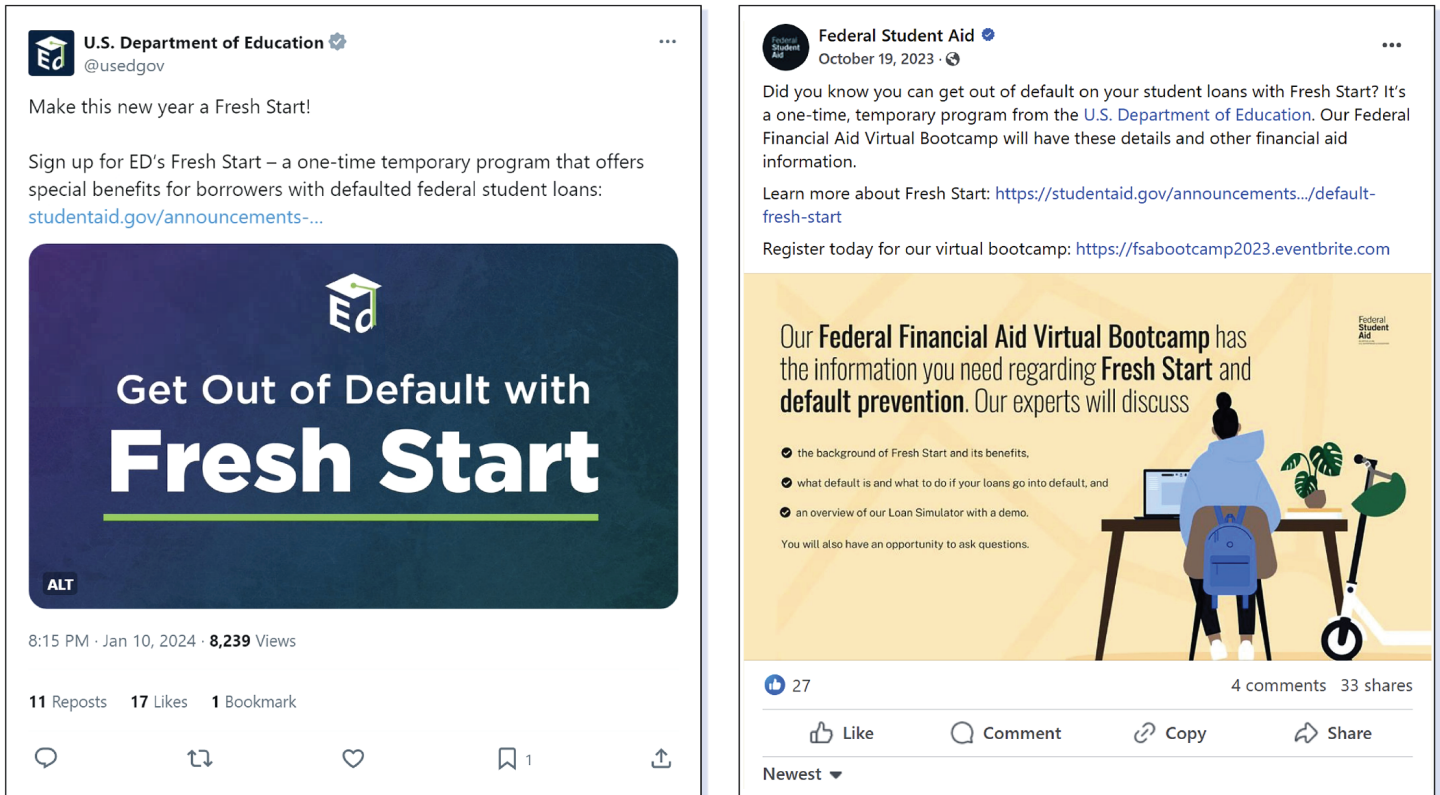
In July 2023, Education sent an email to all borrowers that explained that the on-ramp would help borrowers avoid the worst consequences of missing payments, such as negative credit reporting. The email also stated that interest on student loans would continue to accrue for the borrower's account during the on-ramp period. Education officials told us that they did not include the end date of the on-ramp in this communication because they had not determined the specific end-date when they developed these communications. They explained that Education intended the on-ramp to run for 12 months following the end of the payment pause, a date that was not finalized until the Fiscal Responsibility Act of 2023 was enacted in June 2023.

Education provided more detailed information about the on-ramp to borrowers who benefitted from the temporary relief initiative. Specifically, Education instructed loan servicers to automatically enroll borrowers in the on-ramp once they were 90 days past due on payments and to send enrollment letters via the borrower's preferred method of communication (e.g., email or postal mail). Education provided loan servicers with the specific language to use in the enrollment letters. The example letters we reviewed from all four student loan servicers in April 2024 included the following information about the on-ramp period:

- A clear explanation that the borrower's loans were not considered delinquent,
- Notification that interest accrual on loans had resumed,
- Actionable information on managing monthly payments through income-driven repayment plans and auto pay,¹⁴ and
- Links to Education resources containing more detailed information and contact information for student loan servicers.

Temporary relief for borrowers with defaulted loans. Education provided information about how borrowers can get their loans out of default through the Fresh Start program in multiple locations on its website. For example, Education created a dedicated webpage with detailed information about Fresh Start, including the end date for this temporary program. The landing page for StudentAid.gov included a link to this page, and Education also included information about Fresh Start on its debt resolution website (myeddebt.ed.gov) for borrowers with defaulted loans. Borrowers could use the debt resolution website to apply to get their loans out of default through Fresh Start until the program ended. Education also provided information to borrowers about Fresh Start in five posts on its social media channels in October 2023 and January 2024 (see fig. 2).

Figure 2: Examples of Education’s Social Media Posts about the Fresh Start Program



Source: Department of Education social media. | GAO-25-107111

Accessible Data for Figure 2: Examples of Education’s Social Media Posts about the Fresh Start Program

Collage shows two department of education posts on social media platforms.

1. Make this new year a Fresh Start! Sign up for ED’s Fresh Start – a one-time temporary program that offers special benefits for borrowers with defaulted federal student loans: studentaid.gov/announcements...
2. Did you know you can get out of default on your student loans with Fresh Start? It’s a one-time, temporary program from the U.S. Department of Education. Our Federal Financial Aid Virtual Bootcamp will have these details and other financial aid information. Learn more about Fresh Start: <https://studentaid.gov/announcements.../default-fresh-start>. Register today for our virtual bootcamp: <https://fsabootcamp2023.eventbrite.com>

Source: Department of Education social media. | GAO-25-107111

As of June 2024, Education had also sent three emails and a postal mail letter to defaulted borrowers informing them about Fresh Start since the temporary program was announced in April 2022. Our review of examples of these communications found that Education provided the following information to borrowers:

- A list of benefits of the program, such as putting borrowers’ loans back in good standing, removing the record of default from their credit reports, and letting them regain access to federal student aid;
- A description of the negative effects of not signing up for Fresh Start, such as collections on their defaulted loans restarting;15
- Information about how defaulted borrowers can sign up for Fresh Start— including relevant links to StudentAid.gov and a phone number to call; and

- Information about income-driven repayment plans as an option for repaying loans once out of default.

The third email sent to defaulted borrowers between late March 2024 and early April 2024 stated that borrowers needed to apply for Fresh Start by September 30, 2024, to get their loans out of default. As of May 2024, over 500,000 borrowers had signed up for Fresh Start, according to Education officials.

How did Education plan to communicate about the end of temporary relief options?

In June 2024, Education began to implement a plan for communicating with borrowers about the end of the on-ramp and the Fresh Start program. Education officials described their borrower communication plan as a living document that they will review and update routinely.

Education's plan includes updating StudentAid.gov as needed and providing borrowers with additional communications about the on-ramp and Fresh Start.

- **On-ramp.** Education sent emails about the end of the on-ramp to borrowers who had missed payments in August 2024, and planned to send additional emails about the end of the on-ramp to these borrowers in fall 2024.
- **Fresh Start.** Education sent emails and postal mail letters in June 2024 and August 2024 encouraging defaulted borrowers to sign up for Fresh Start before its end date. Education planned to send emails to defaulted borrowers again in fall 2024. Education also provided information about Fresh Start and its end date through a webinar in June 2024 and monthly social media posts from July 2024 to September 2024.

Officials from Education and from three of the four student loan servicers acknowledged the importance of communicating about the end of the on-ramp to help borrowers avoid the negative consequences of delinquency and default when this temporary relief option ends.

Education officials said they shared their borrower communication plan with the student loan servicers. They also said that servicers may decide to do additional outreach with borrowers about the expiration of the on-ramp in addition to continuing to send monthly billing statements. According to Education's plan, servicers that want to conduct additional outreach would need to send their plans and content to Education for review before beginning any outbound communications.

How has Education sought to ensure the quality of its communications?

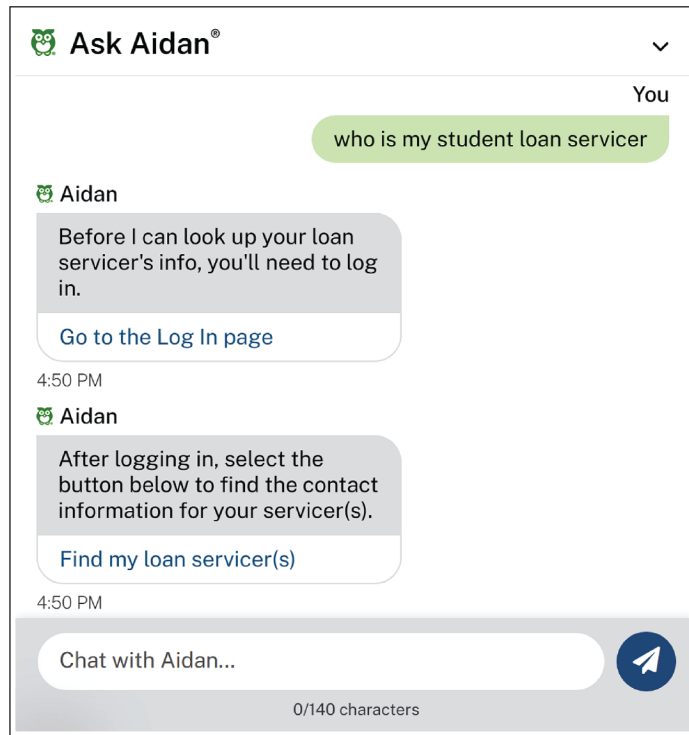
Education officials told us that they sought borrower input to help determine how best to communicate with borrowers about resuming payments. This included surveying and interviewing borrowers, studying how borrowers engage with information on StudentAid.gov, and testing borrower responses to emails from Education. For example, Education officials stated that they:

- incorporated action-item checklists for borrowers in web and email communications based on the results of a survey, interviews, and user testing with borrowers. For example, checklists included action items for resuming

payments, such as when borrowers should check their monthly payment amount, and when to apply for income-driven repayment plans.

- tested four different versions of an email about the Fresh Start program with a sample of defaulted borrowers to learn their preferences on content (e.g., tone and type of information to prioritize) and what would most likely encourage them to respond.¹⁶ Education selected the preferred version of the email to send to defaulted borrowers.
- identified borrowers' most common questions to a virtual assistant chatbot on StudentAid.gov. Education officials said they regularly changed the content and display of information on StudentAid.gov to prioritize answers to the most common questions (see fig. 3).

Figure 3: Example of Question and Answer from Education's Virtual Assistant Chatbot



Source: Department of Education's StudentAid.gov website. | GAO-25-107111

Accessible Data for Figure 3: Example of Question and Answer from Education's Virtual Assistant Chatbot

Figure shows an exchange on the "Ask Aidan" service:

- You: Who is my student loan servicer
- Aidan: Before I can look up your loan servicer's info, you'll need to log in. [Go to the Log In page]
- Aidan: After logging in, select the button below to find the contact information for your servicer(s). [Find my loan servicer(s)]

Source: Department of Education's StudentAid.gov website. | GAO-25-170111

Education also partnered with public and private organizations to increase outreach and communication to borrowers about the SAVE income-driven repayment plan.¹⁷ As part of this, Education developed a toolkit with resources, including fact sheets, social media posts, emails, videos, and webinars, to help these partner organizations learn about repayment and communicate with borrowers. For example, Education hosted webinars that provided information

about the SAVE plan and made them available to the partners in the toolkit for on-demand viewing.

Agency Comments

We provided a draft of this report to Education for review and comment. Education's written comments are reproduced in Appendix I. Education also provided technical comments, which we incorporated as appropriate. We also provided relevant report sections to the four loan servicers included in our review for their technical comments. Loan servicers did not have any comments.

In written comments, Education stated that it appreciated GAO's review of the department's student loan repayment communications as it works to support borrowers. Education also stated that it had anticipated significant challenges in supporting about 28 million borrowers in returning to repayment, which represents a fivefold increase compared to the number of borrowers entering repayment in a typical year.

Education provided additional detail and context on its efforts to communicate with borrowers described in the report, including implementing a communication plan to reach borrowers directly. For example, from summer 2023 until early 2024, Education reported sending more than 260 million emails to borrowers with a focus on income-driven repayment and how to prepare for payments to resume. Education stated that it plans further communications in the fall and winter of 2024 and 2025 to support and inform borrowers. Education also noted that it will need to continue to communicate with these borrowers to ensure that they have the tools and resources they need to avoid delinquency and default as the on-ramp ends.

How GAO Did This Study

To determine how Education communicated with borrowers about resuming student loan payments, we reviewed Education and student loan servicer written communication with borrowers, including those specifically targeting borrowers at risk of delinquency and default. Our review included different types of communication, such as information on Education's website, emails, letters, social media posts, and billing statements. We also reviewed Education's communication plans, interviewed Education officials, and collected information through written responses from Education and all four of its student loan servicers.¹⁸

We conducted this performance audit from October 2023 to October 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

List of Addressees

The Honorable Robert C. "Bobby" Scott
Ranking Member
Committee on Education and the Workforce
House of Representatives

We are sending copies of this report to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

GAO Contact Information

For more information, contact: Melissa Emrey-Arras, Director, Education, Workforce and Income Security, EmreyArrasM@gao.gov, (617) 788-0534.

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Staff Acknowledgments: Debra Prescott (Assistant Director), Kristy Kennedy (Analyst-in-Charge), Angelica Guarino, Summer Pachman, James Bennett, Namita Bhatia, Elizabeth Calderon, Gina Hoover, Michael Naretta, Meg Sommerfeld, Almeta Spencer, and Adam Wendel.

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Appendix I: Comments from the Department of Education



September 13, 2024

Melissa Emrey-Arras
Director, Education, Workforce, and Income Security
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Ms. Emrey-Arras:

I write on behalf of the U.S. Department of Education (Department), office of Federal Student Aid (FSA) in response to the Government Accountability Office (GAO) draft report, *Federal Student Loans: How Education Has Communicated with Borrowers about Resuming Payments* (GAO-25-107111). We appreciate the opportunity to review this draft report, which contains no recommendations.

The Department's return to repayment communication efforts were unprecedented and successful in many ways. Compared to before the pandemic, more borrowers made payments on their student loans in January 2024 than in any previous month on record. The share of the federal portfolio that is making payments has returned to approximately the same level as prior to the pandemic. Additionally, borrowers are returning to a reformed student loan system, with new student loan servicing contracts that improve customer outcomes and vendor accountability, and more effective implementation of longstanding student loan forgiveness programs. However, there remains a need for concerted efforts by the Department, its contractors, its partners, and Congress to ensure that student loans continue to provide meaningful access to higher education without overburdening borrowers for years to come.

The Department anticipated significant challenges in supporting around 28 million borrowers in returning to repayment; this number was five times greater than the typical number of borrowers who had previously entered repayment in any given year.

FSA supported borrowers during this time by processing targeted debt relief for millions of eligible borrowers, implementing the Saving on a Valuable Education (SAVE) Plan, and creating a temporary on-ramp to protect borrowers from the worst consequences of missed, late, or partial payments. FSA also executed a multi-channel communications

plan to reach borrowers directly and hold loan servicers accountable for informing borrowers of all available options and resources.

We are pleased that the GAO draft report highlights the Department's extensive efforts to effectively communicate and reengage with borrowers after the end of the payment pause, including the Department's:

- Multi-channel communications plan to reach borrowers and inform them of the return to repayment and temporary relief programs using webinars, emails, letters, text messages, and content on website and social media platforms;
- Ensuring high quality communications through the use of user experience design elements, focus groups, and consumer testing; and
- Communications tactics used to drive program uptake rates that ultimately decrease the risk of delinquency, like customized content, risk segmentation targeting, and additional communications to the most at risk borrowers.

Soon after the beginning of the payment pause, FSA began preparations to implement a multi-channel communications approach to reach borrowers to inform them about the resumption of payments. FSA developed plans to reach out to all borrowers multiple times with the goal of reaching borrowers with the right message at the right time. To prepare for borrowers to return to repayment, FSA utilized past user experience research to segment borrowers into different populations and created content and messaging that would not only provide these borrowers with helpful information but would also resonate to their current situation and drive them to act promptly before payments began. This included messages that were supportive, factual, and actionable, addressing opportunities to access affordable and lower payments and explore forgiveness opportunities, and timely calls to action.

These communications were significant and unprecedented and occurred over two phases. FSA, in 2020, developed capabilities to communicate at scale directly with borrowers. Leveraging these new tools, FSA's multi-channel communication effort for return to repayment was executed with significant breadth and depth. During the first phase from summer 2023 until early 2024, FSA:

- Sent more than 260 million emails with a delivery rate of 95% and an open rate of 60% with a focus on income-driven repayment and how to prepare for payments to resume.
- Coordinated communication efforts with its loan servicers to review and have them send to borrowers hundreds of different types of communications from social media, SMS, emails, and website updates. These were in addition to monthly billing statements that also helped borrowers identify opportunities to lower unaffordable payments.
- Launched dedicated pages on StudentAid.gov focused on borrowers who are making payments for the first time and for borrowers who are resuming payments.

- In coordination with the Department, and in partnership with leading grassroots organizations, launched the SAVE on Student Debt campaign aimed to help borrowers reduce their student loan payments by encouraging them to enroll in an income driven repayment (IDR) Plan.
- Implemented the Targeted Early Delinquency Intervention (TEDI) behavior communications approach that sent and delivered nearly 120 million emails to borrowers who made or missed payments with information on how to sign up for IDR, especially SAVE.
- Worked with researchers in the Office of the Chief Economist at the Department and leading behavioral experts from academia to evaluate the effects of TEDI through a randomized controlled trial. The evaluation indicated that behaviorally informed outreach was effective at encouraging borrowers to make payments, and findings are being used to inform current and future outreach efforts.

As GAO noted, FSA is implementing its second phase of communications to reach borrowers as both on-ramp and Fresh Start come to an end in September 2024. FSA began executing on this communications plan through numerous website updates and emails, social media posts, SMS messaging to borrowers, and live webinars. From March 2024 through August 2024, FSA sent more than 23 million targeted emails and 2.3 million SMS messages to borrowers who can take advantage of or have used these temporary relief programs. In September, FSA also plans to send a final on ramp ending email and two Fresh Start ending emails as final reminders to borrowers before these programs officially end. These are in addition to servicer-led communications and billing statements, both of which supplement the larger FSA communications approach.

FSA plans further communications to borrowers in the fall and winter of 2024/25 to continue to support and inform borrowers. As previously noted, it is common after an extended period of non-payment that there is a population of borrowers who struggle to make their monthly payments. As programs such as on-ramp come to an end, borrowers will face the consequences of missed payments (such as negative credit reporting and default) for the first time in more than four years. FSA will need to continue to communicate and connect with these borrowers to ensure that they have the tools and resources they need to help them avoid delinquency and default, such as signing up for an affordable repayment plan.

FSA continues to adapt its communications and operations to respond to changes in the student loan environment. The Department continues to analyze its communications to inform borrowers of both their financial responsibility and all available options to support their unique financial situation.

Despite the positive signs of borrowers successfully navigating return to repayment, significant challenges remain for both the Department and borrowers. Prior to the payment pause, nearly one million borrowers defaulted on their student loans annually. Communications can help borrowers navigate programs and processes in place. But communications cannot fix the broken repayment system where many borrowers have loans they cannot afford and are unable to access the benefits of a federal student loan.

Page 4 – Melissa Emrey-Arras

Deep-rooted challenges that predated the payment pause will require continued attention by the Department, its contractors, its partners, and Congress to ensure that student loans continue to provide access to higher education without overburdening borrowers for years to come.

Thank you again for the opportunity to review the draft report. Please find enclosed the Department's technical comments.

We appreciate GAO's examination of the Department's student loan repayment communications as we continue to work to support borrowers and ensure and improve access to education for all.

Sincerely,

A handwritten signature in black ink that reads "Denise L Carter". The signature is written in a cursive style with a large initial "D".

Denise Carter
Acting Chief Operating Officer
Federal Student Aid

Enclosure

Accessible Text for Appendix I: Comments from the Department of Education

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These communications were significant and unprecedented and occurred over two phases. FSA, in 2020, developed capabilities to communicate at scale directly with borrowers. Leveraging these new tools, FSA's multi-channel communication effort for return to repayment was executed with significant breadth and depth. During the first phase from summer 2023 until early 2024, FSA:

- Sent more than 260 million emails with a delivery rate of 95% and an open rate of 60% with a focus on income-driven repayment and how to prepare for payments to resume.
- Coordinated communication efforts with its loan servicers to review and have them send to borrowers hundreds of different types of communications from social media, SMS, emails, and website updates. These were in addition to monthly billing statements that also helped borrowers identify opportunities to lower unaffordable payments.
- Launched dedicated pages on StudentAid.gov focused on borrowers who are making payments for the first time and for borrowers who are resuming payments.
- In coordination with the Department, and in partnership with leading grassroots organizations, launched the SAVE on Student Debt campaign aimed to help borrowers reduce their student loan payments by encouraging them to enroll in an income driven repayment (IDR) Plan.
- Implemented the Targeted Early Delinquency Intervention (TEDI) behavior communications approach that sent and delivered nearly 120 million emails to borrowers who made or missed payments with information on how to sign up for IDR, especially SAVE.
- Worked with researchers in the Office of the Chief Economist at the Department and leading behavioral experts from academia to evaluate the effects of TEDI through a randomized controlled trial. The evaluation indicated that behaviorally informed outreach was effective at encouraging borrowers to make payments, and findings are being used to inform current and future outreach efforts.

As GAO noted, FSA is implementing its second phase of communications to reach borrowers as both on-ramp and Fresh Start come to an end in September 2024. FSA began executing on this communications plan through numerous website updates and emails, social media posts, SMS messaging to borrowers, and live webinars. From March 2024 through August 2024, FSA sent more than 23 million targeted emails and 2.3 million SMS messages to borrowers who can take advantage of or have used these temporary relief programs. In September, FSA also plans to send a final on ramp ending email and two Fresh Start ending emails as final reminders to borrowers before these programs officially end.

These are in addition to servicer-led communications and billing statements, both of which supplement the larger FSA communications approach.

FSA plans further communications to borrowers in the fall and winter of 2024/25 to continue to support and inform borrowers. As previously noted, it is common after an extended period of non-payment that there is a population of borrowers who struggle to make their monthly payments. As programs such as on-ramp come to an end, borrowers will face the consequences of missed payments (such as negative credit reporting and default) for the first time in more than four years. FSA will need to continue to communicate and connect with these borrowers to ensure that they have the tools and resources they need to help them avoid delinquency and default, such as signing up for an affordable repayment plan.

FSA continues to adapt its communications and operations to respond to changes in the student loan environment. The Department continues to analyze its communications to inform borrowers of both their financial responsibility and all available options to support their unique financial situation.

Despite the positive signs of borrowers successfully navigating return to repayment, significant challenges remain for both the Department and borrowers. Prior to the payment pause, nearly one million borrowers defaulted on their student loans annually. Communications can help borrowers navigate programs and processes in place. But communications cannot fix the broken repayment system where many borrowers have loans they cannot afford and are unable to access the benefits of a federal student loan.

Deep-rooted challenges that predated the payment pause will require continued attention by the Department, its contractors, its partners, and Congress to ensure that student loans continue to provide access to higher education without overburdening borrowers for years to come.

Thank you again for the opportunity to review the draft report. Please find enclosed the Department's technical comments.

We appreciate GAO's examination of the Department's student loan repayment communications as we continue to work to support borrowers and ensure and improve access to education for all.

Sincerely,

Denise Carter
Acting Chief Operating Officer
Federal Student Aid

Enclosure

Endnotes

¹The CARES Act was enacted on March 27, 2020. See Pub. L. No. 116-136, § 3513, 134 Stat. 281, 404-05 (2020). Education implemented this COVID-19 emergency relief for federal student loans held by the agency retroactive to March 13, 2020, the date COVID-19 was declared a national emergency.

²In general, default on a federal student loan occurs when a borrower reaches 270 days of delinquency (failure to make a payment when due). Involuntary collections may include wage garnishments and offsets of tax refunds or federal benefit payments.

³Pub. L. No. 118-5, § 271, 137 Stat. 10, 33-34.

⁴Education considers a student loan payment past due the first day after a borrower misses a payment. Past due includes periods of delinquency, which is typically defined as more than 30 days past due. Education typically reports borrowers as delinquent to credit reporting agencies when borrowers become 90 days past due on their loan payments. However, Education refrained from this practice for 12 months after the payment pause ended, October 2023 through September 2024.

⁵Income-driven repayment plans are designed to make student loan payments more affordable. These plans base monthly payment amounts on a borrower's income and family size, extend repayment periods from the standard 10 years to up to 20 or 25 years, and forgive any loan balances remaining at the end of the repayment period. Under the SAVE plan, the remaining unpaid balance of loans is forgiven after up to 20 years for borrowers with only undergraduate loans and up to 25 years for borrowers with any graduate loans.

⁶Monthly payment amounts are set as a proportion of the borrower's discretionary income, which Education defines as adjusted gross income that exceeds 225 percent of the applicable poverty guideline for the SAVE plan and 100 or 150 percent of the applicable guideline for other income-driven repayment plans. Also, under the SAVE plan, if a borrower makes a full monthly payment, the borrower will not be charged any remaining accrued interest that month. However, for some borrowers with higher income, enrolling in the SAVE plan may result in higher payments compared to repayment plans that cap monthly payment amounts at less than or equal to the fixed monthly payment amount under the Standard 10-year repayment plan.

⁷The online income-driven repayment application also allowed borrowers to consent to have Education pull their income and family size information directly from their most recent federal tax return. According to Education officials, this change was intended to improve the accuracy of monthly payment calculations and ease the application process for borrowers. Borrowers who provided their consent could have their income-driven repayment enrollment automatically recertified each year, rather than having to fill out an application every year to recertify.

⁸Forbearance allows eligible borrowers to temporarily postpone making payments.

⁹Education officials explained that the online application is coded to determine borrowers' eligibility for repayment plans and calculate their monthly payments consistent with the final rule for the SAVE plan, which is currently stayed. As a result, they said Education took down the online application on July 18, 2024, and is directing borrowers who wish to apply for an income-driven repayment plan to submit a PDF version of the application to their servicer while the online application is unavailable. As of August 2024, Education did not have an estimate for when the online application would be made available again.

¹⁰In addition, on August 28, 2024, the U.S. Supreme Court issued an Order pertaining to other litigation involving SAVE that was ongoing. In that case, the federal court for the District of Kansas issued a preliminary injunction enjoining Education from implementing parts of the SAVE plan on June 24, 2024. On June 30, 2024, the U.S. Court of Appeals for the Tenth Circuit granted an emergency motion for a stay of that preliminary injunction pending appeal. The U.S. Supreme Court Order in that case denied a request to vacate the stay. In the Order, the U.S. Supreme Court noted that the applicants of the initial request stated that they do not require the stay to be vacated as long as the Eighth Circuit's injunction is in place. According to Education, the latest public information on the SAVE litigation can be found on the department's website. See "Department of Education Updates on Saving on a Valuable Education (SAVE Plan)," Department of Education, accessed September 23, 2024, <https://www.ed.gov/Save> and "SAVE Plan Court Actions: Impact on Borrowers," Department of Education, accessed September 23, 2024, <https://www.StudentAid.gov/saveaction>.

¹¹The months that a borrower uses the on-ramp do not count toward loan forgiveness.

¹²Borrowers with defaulted loans are not eligible to choose a repayment plan or receive deferment or forbearance, options that allow a borrower to temporarily postpone or reduce their federal

student loan payments. Interest does not accrue on some types of federal student loans during a deferment, while interest accrues on all types of loans during a forbearance. Borrowers with defaulted loans are also not eligible for additional federal student aid. Borrowers who get their loans out of default through Fresh Start restore their eligibility for these benefits.

¹³Education opted not to resume collections on defaulted loans, such as wage garnishments and offsets on tax refunds and federal benefit payments until after the Fresh Start program ended. Borrowers who did not apply to get their loans out of default before the program ended would be subject to collections when Education resumed them in October 2024.

¹⁴Auto pay allows borrowers to have their monthly payments automatically debited from their bank account. Borrowers save 0.25 percent on their interest rate if they enroll in auto pay for their student loans.

¹⁵Collections may include wage garnishments and offsets of tax refunds or other government payments.

¹⁶Education officials also said that they designed the content and formatting of these test emails based on feedback provided during listening sessions with groups that work with borrowers.

¹⁷These partner organizations included Civic Nation, the NAACP, the National Urban League, Rise, the Student Debt Crisis Center, UnidosUS, and Young Invincibles, among others.

¹⁸We included in our review the four servicers that were servicing loans when the student loan payment pause ended and monthly payments resumed: Aidvantage, Edfinancial, Missouri Higher Education Loan Authority, and Nelnet.