Persis Yu  
Staff Attorney  
National Consumer Law Center  
7 Winthrop Square, 4th Floor  
Boston, MA 02110

RE: FOIA Request No. 19-01776-F

Dear Persis Yu:

This letter is an interim response to your request for information pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, dated July 1, 2019 and received in this office on July 2, 2019. Your request was forwarded to the appropriate offices to search for documents that may be responsive to your request: Office of Financial Operations (OFO) and Federal Student Aid (FSA).

You requested:

- We seek information to determine how many people will be eligible for forgiveness based upon their early and continuous enrollment in the ICR plan or enrollment in ICR followed by a switch to another IDR plan like Income Base Repayment or REPAYE. We also seek information about how many borrowers would potentially be eligible for forgiveness but for common challenges borrowers face in repayment, including missed, delayed, or nonqualifying payments due to recertification delays, forbearances, certain deferments, and missed payments. Specifically, we request all records, including reports, memoranda, forms, and other documents dating back to July 1, 1994, that discuss, analyze, itemize, address, or pertain to:

Part A: Borrowers Expected to Receive IDR Forgiveness

1) Number of borrowers paying in the ICR plan who have made 300 “qualifying” payments as defined in 34 CFR §§ 685.209 and 685.221 as of July 1, 2019, broken down by servicer, state, race, and gender.

2) Data on loans where borrowers have made 300 “qualifying” payments in ICR as of July 1, 2019, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by servicer, state, race, and gender.

3) Number of borrowers paying in any IDR plan who have made 300 “qualifying” payments as of July 1, 2019, broken down by servicer, IDR plan, state, race, and gender.

4) Data on loans where borrowers have made 300 “qualifying” payments in any IDR as of July 1, 2019, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by servicer, IDR plan, state, race, and gender.

5) The number of borrowers as of the date that this request is fulfilled who have received forgiveness under any IDR plan, broken down by month and year of forgiveness, servicer, IDR plan, whether the borrower had any graduate loans forgiven, state, race, and gender.
6) Data on loans where borrowers as of the date that this request is fulfilled who have received forgiveness under any IDR plan, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by month and year of forgiveness, servicer, IDR plan, whether the borrower had any graduate loans forgiven, state, race, and gender.

7) Number of borrowers paying in any IDR plan who are expected to have their loans forgiven in 2019, broken down by month, servicer, IDR plan, whether the borrower has graduate loans, state, race, and gender.

8) Data on loans where borrowers paying in any IDR plan who are expected to have their loans forgiven in 2019, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by servicer, IDR plan, whether the borrower has graduate loans, state, race, and gender.

9) Number of “qualifying” payments made by any borrower who was ever enrolled in an IDR plan broken down by IDR plan, whether the borrower has graduate loans, state, race, and gender.

10) As of the date that this request is fulfilled, the number of borrowers sent notices by the U.S. Department of Education or its servicers explaining “that the borrower is approaching the date that he or she is expected to meet the requirements to receive loan forgiveness” as required by 34 CFR §§ 685.209 and 685.221, broken down by month and year sent, IDR plan, servicer, state, race, and gender.

11) Written notices sent by the U.S. Department of Education or its servicers indicating either “that the borrower is approaching the date that he or she is expected to meet the requirements to receive loan forgiveness” or “that the borrower's obligation on the loans is satisfied” as required by 34 CFR §§ 685.209 and 685.221.

12) Processes in place, including but not limited to instructions to servicers, to ensure that the Secretary is able to determine when a borrower has met the loan forgiveness requirements as required by 34 CFR §§ 685.209 and 685.221.

13) Any projections (including but not limited to those done by the U.S. Department of Education, any of its servicers or other contractors, or other agencies) of the number of borrowers expected to receive forgiveness through IDR, in total and broken down by year in which forgiveness is projected to occur, servicer, IDR plan, state, race, and gender.

14) Any projections (including but not limited to those done by the U.S. Department of Education, any of its servicers or other contractors, or other agencies) of the total dollar amount (with principal and interest itemized) of loans expected to receive forgiveness through IDR, in total and broken down by year in which forgiveness is projected to occur, servicer, IDR plan, state, race, and gender.

Part B: IDR Enrollment Data

1) Number of borrowers enrolling for the first time in any IDR plan broken down by servicer, IDR plan, month and year of enrollment, state, race, and gender.

2) Number of borrowers who enrolled in any IDR plan and remained in any IDR plan continuously until the loan was repaid, forgiven, or to the present, broken down by servicer, IDR plan, present status, month and year of initial enrollment, state, race, and gender.

3) Number of borrowers who switched from one IDR plan to another IDR plan, broken down by servicer, original IDR plan, new IDR plan, month and year of IDR switch, state, race, and gender.

4) Number of borrowers who exited an IDR plan and switched into a non-IDR plan, broken down by servicer, IDR plan, month and year of plan switch, state, race, and gender.
Part C: On-Time Recertification

1) Number of borrowers who recertify their IDR plan on-time, broken down by servicer, IDR plan, year, state, race, and gender.
2) Number of borrowers who recertify their IDR plan after the hard deadline, broken down by length of delay in recertifying, servicer, IDR plan, year, state, race, and gender.
3) Number of borrowers who have recertified their IDR plan late multiple times, broken down by the number of times the borrower has recertified late, servicer, IDR plan, year, state, race, and gender.
4) Number of borrowers who fail to recertify their IDR plan, broken down by servicer, IDR plan, year, state, race, and gender.

Part D: Delinquency and Default

1) Number of borrowers who were enrolled in an IDR plan when they defaulted, broken down by servicer, plan, month and year of default, state, race, and gender.
2) Number of borrowers who failed to recertify their IDR plan and defaulted within 12 months after failing to recertify, broken down by servicer, plan, year of default, state, race, and gender.
3) Delinquency status of borrowers currently enrolled in an IDR plan, broken down by plan, servicer, state, race, and gender.

Part E: Forbearances and Deferments

1) Number of borrowers enrolled in an IDR plan who were placed in a forbearance or deferment, broken down by IDR plan, year, servicer, type of forbearance or deferment, duration of forbearance or deferment, state, race, and gender.

Part F: Paid Loans

1) Number of borrowers who were enrolled in an IDR plan and paid their loans in full, broken down by IDR plan, whether the borrower has graduate loans, year, servicer, state, race, and gender.
2) Data on loans where borrowers were enrolled in an IDR plan and paid their loans in full, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by IDR plan, whether the borrower has graduate loans, servicer, state, race, and gender.
3) Number of borrowers who were enrolled in an IDR plan and had their loans forgiven through a cancellation program (including but not limited to Total and Permanent Disability, Death, closed school, borrower defense, false certification, Public Service Loan Forgiveness), broken down by IDR plan, whether the borrower has graduate loans, year, servicer, forgiveness program, state, race, and gender.
4) Data on loans where borrowers who were enrolled in an IDR plan and had their loans forgiven through a cancellation program, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by IDR plan, whether the borrower has graduate loans, servicer, forgiveness program, state, race, and gender.
5) Number of borrowers who were enrolled in an IDR plan when they consolidated the loan that was in IDR, broken down by IDR plan, whether the borrower has graduate loans, year, and servicer, state, race, and gender.
This response pertains to records available in FSA. Attached to this e-mail are 45 pages of documents responsive to your request. The documents provided are:

- FSA - IDRICR letters and CRs
- FSA - DRT & Servicing

However, certain information has been withheld according to FOIA exemptions (b)(6), specified below:

- Records or portions of records relating to personal information is exempt pursuant to 5 U.S.C. §552 (b)(6) of the FOIA. Disclosure of this information would constitute a clearly unwarranted invasion of personal privacy.

At this time, the Department is continuing to process your request. You will receive any additional documents under a separate cover letter.

Sincerely,

Arthur Caliguiran
Arthur Caliguiran
FOIA Analyst
FOIA Service Center

Attachment
Background

ICR is for Direct Loans only. While the plan was created July 1, 1994, it wasn’t implemented until 1995 as Direct Loans were not originated until July 1, 1994. We would expect these loans to spend some time in an in-school status, and then 6 months in grace before ultimately entering repayment. If the borrower immediately enrolled in ICR after entering repayment, given the timeframes for in-school statuses and the grace period, very few borrowers will reach 25 years of ICR even in 2020.

However, it is possible for borrowers to switch from ICR with a 25-year repayment requirement to another plan such as REPAYE (with a 20-year repayment requirement), to be eligible for forgiveness sooner. This is happening and we currently have processed IDR forgiveness for less than 20 borrowers. Due to the small number of borrowers, we are not able to segment these borrowers by any demographic categories.

Part A: Borrowers Expected to Receive IDR Forgiveness

1) Number of borrowers paying in the ICR plan who have made 300 “qualifying” payments as defined in 34 CFR §§ 685.209 and 685.221 as of July 1, 2019, broken down by servicer, state, race, and gender.

Per statement above, no borrowers in ICR have reached 25 years.

2) Data on loans where borrowers have made 300 “qualifying” payments in ICR as of July 1, 2019, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by servicer, state, race, and gender.

Not applicable.

3) Number of borrowers paying in any IDR plan who have made 300 “qualifying” payments as of July 1, 2019, broken down by servicer, IDR plan, state, race, and gender.

Per statement above, less than 20 borrowers have made 300 “qualifying” IDR payments, resulting in the forgiveness of the remaining balance of their loans. Due to the small number of borrowers, we are not able to segment these borrowers by any demographic categories.

4) Data on loans where borrowers have made 300 “qualifying” payments in any IDR as of July 1, 2019, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by servicer, IDR plan, state, race, and gender.

Per statement above, less than 20 borrowers have made 300 “qualifying” IDR payments, resulting in the forgiveness of the remaining balance of their loans. Due to the small number of borrowers, we are not able to segment these borrowers by any demographic categories.

5) The number of borrowers as of the date that this request is fulfilled who have received forgiveness under any IDR plan, broken down by month and year of forgiveness, servicer, IDR plan, whether the borrower had any graduate loans forgiven, state, race, and gender.

Per statement above, less than 20 borrowers have made 300 “qualifying” IDR payments, resulting in the forgiveness of the remaining balance of their loans. Due to the small number of borrowers, we are not able to segment these borrowers by any demographic categories.
6) Data on loans where borrowers as of the date that this request is fulfilled who have received forgiveness under any IDR plan, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by month and year of forgiveness, servicer, IDR plan, whether the borrower had any graduate loans forgiven, state, race, and gender.

Approximately $454K were forgiven as a result of borrowers reaching the cap on their IDR student loan payments. This includes approximately $371K in principal and $83K in interest. The median loan balance for these borrowers was $14,495.

7) Number of borrowers paying in any IDR plan who are expected to have their loans forgiven in 2019, broken down by month, servicer, IDR plan, whether the borrower has graduate loans, state, race, and gender.

A total of 17 borrowers have received letters from servicers regarding IDR discharges.

8) Data on loans where borrowers paying in any IDR plan who are expected to have their loans forgiven in 2019, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by servicer, IDR plan, whether the borrower has graduate loans, state, race, and gender.

A subset of the 17 borrowers listed above, less than 10, are expected to have loans discharged in 2019. Due to the small number, we are unable to segment these borrowers by any demographic categories.

9) Number of “qualifying” payments made by any borrower who was ever enrolled in an IDR plan broken down by IDR plan, whether the borrower has graduate loans, servicer, state, race, and gender.

FSA systems do not allow for this type of analysis. No records.

10) As of the date that this request is fulfilled, the number of borrowers sent notices by the U.S. Department of Education or its servicers explaining “that the borrower is approaching the date that he or she is expected to meet the requirements to receive 3 loan forgiveness” as required by 34 CFR §§ 685.209 and 685.221, broken down by month and year sent, IDR plan, servicer, state, race, and gender.

See response to Element 7 above.

11) Written notices sent by the U.S. Department of Education or its servicers indicating either “that the borrower is approaching the date that he or she is expected to meet the requirements to receive loan forgiveness” or “that the borrower's obligation on the loans is satisfied” as required by 34 CFR §§ 685.209 and 685.221.

Responsive records are enclosed.

12) Processes in place, including but not limited to instructions to servicers, to ensure that the Secretary is able to determine when a borrower has met the loan forgiveness requirements as required by 34 CFR §§ 685.209 and 685.221.

Responsive records are enclosed.
13) Any projections (including but not limited to those done by the U.S. Department of Education, any of its servicers or other contractors, or other agencies) of the number of borrowers expected to receive forgiveness through IDR, in total and broken down by year in which forgiveness is projected to occur, servicer, IDR plan, state, race, and gender.

Referred to the Department’s Budget Service for response.

14) Any projections (including but not limited to those done by the U.S. Department of Education, any of its servicers or other contractors, or other agencies) of the total dollar amount (with principal and interest itemized) of loans expected to receive forgiveness through IDR, in total and broken down by year in which forgiveness is projected to occur, servicer, IDR plan, state, race, and gender

Referred to the Department’s Budget Service for response.

Part B: IDR Enrollment Data

1) Number of borrowers enrolling for the first time in any IDR plan broken down by servicer, IDR plan, month and year of enrollment, state, race, and gender.

Not available as requested. However, as a courtesy, the following table shows borrowers enrolling an IDR plan for the first time by month, beginning in July 2017:

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<tr>
<th>Date</th>
<th>New IDR Enrollment (rounded to nearest thousand)</th>
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</thead>
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<td>Jul 2017</td>
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</tr>
<tr>
<td>Aug 2017</td>
<td>127,000</td>
</tr>
<tr>
<td>Sep 2017</td>
<td>109,000</td>
</tr>
<tr>
<td>Oct 2017</td>
<td>117,000</td>
</tr>
<tr>
<td>Nov 2017</td>
<td>145,000</td>
</tr>
<tr>
<td>Dec 2017</td>
<td>152,000</td>
</tr>
<tr>
<td>Jan 2018</td>
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<tr>
<td>Feb 2018</td>
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</tr>
<tr>
<td>Mar 2018</td>
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</tr>
<tr>
<td>Apr 2018</td>
<td>121,000</td>
</tr>
<tr>
<td>May 2018</td>
<td>111,000</td>
</tr>
<tr>
<td>Jun 2018</td>
<td>125,000</td>
</tr>
<tr>
<td>Jul 2018</td>
<td>114,000</td>
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<tr>
<td>Aug 2018</td>
<td>104,000</td>
</tr>
<tr>
<td>Sep 2018</td>
<td>100,000</td>
</tr>
<tr>
<td>Oct 2018</td>
<td>96,000</td>
</tr>
<tr>
<td>Nov 2018</td>
<td>120,000</td>
</tr>
<tr>
<td>Dec 2018</td>
<td>138,000</td>
</tr>
<tr>
<td>Jan 2019</td>
<td>110,000</td>
</tr>
<tr>
<td>Feb 2019</td>
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<tr>
<td>Mar 2019</td>
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<tr>
<td>Apr 2019</td>
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<tr>
<td>May 2019</td>
<td>91,000</td>
</tr>
<tr>
<td>Jun 2019</td>
<td>129,000</td>
</tr>
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</table>
2) Number of borrowers who enrolled in any IDR plan and remained in any IDR plan continuously until the loan was repaid, forgiven, or to the present, broken down by servicer, IDR plan, present status, month and year of initial enrollment, state, race, and gender.

*No records.*

3) Number of borrowers who switched from one IDR plan to another IDR plan, broken down by servicer, original IDR plan, new IDR plan, month and year of IDR switch, state, race, and gender.

*No records.*

4) Number of borrowers who exited an IDR plan and switched into a non-IDR plan, broken down by servicer, IDR plan, month and year of plan switch, state, race, and gender.

*Not available as requested. However, as a courtesy, the following table shows the repayment plan the borrower entered after leaving IDR. Please note that borrowers can have multiple repayment plans. Borrower counts are rounded to the nearest hundred.*

<table>
<thead>
<tr>
<th></th>
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<td>Consolidation Standard Repayment</td>
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<td>1,400</td>
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<tr>
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<tr>
<td>Alternative Fixed Term Repayment Plan</td>
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<tr>
<td>Standard Repayment</td>
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<td>2,600</td>
<td>2,700</td>
<td>2,700</td>
<td>2,400</td>
<td>2,600</td>
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</tbody>
</table>

**Part C: On-Time Recertification**

1) Number of borrowers who recertify their IDR plan on-time, broken down by servicer, IDR plan, year, state, race, and gender.

*Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate data requested. Would result in significant disruption of contractor’s ability to produce key deliverables.*
2) Number of borrowers who recertify their IDR plan after the hard deadline, broken down by length of delay in recertifying, servicer, IDR plan, year, state, race, and gender.

Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate data requested. Would result in significant disruption of contractor’s ability to produce key deliverables.

3) Number of borrowers who have recertified their IDR plan late multiple times, broken down by the number of times the borrower has recertified late, servicer, IDR plan, year, state, race, and gender.

Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate data requested. Would result in significant disruption of contractor’s ability to produce key deliverables.

4) Number of borrowers who fail to recertify their IDR plan, broken down by servicer, IDR plan, year, state, race, and gender.

Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate requested data. Would result in significant disruption of contractor’s ability to produce key deliverables.

Part D: Delinquency and Default

1) Number of borrowers who were enrolled in an IDR plan when they defaulted, broken down by servicer, plan, month and year of default, state, race, and gender.

Not available as requested. However, the following table shows the number of borrowers (rounded to the nearest thousand) who entered default from an IDR plan.

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<td>23,000</td>
<td>23,000</td>
<td>16,000</td>
<td>12,000</td>
</tr>
</tbody>
</table>

2) Number of borrowers who failed to recertify their IDR plan and defaulted within 12 months after failing to recertify, broken down by servicer, plan, year of default, state, race, and gender.

Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate requested data. Would result in significant disruption of contractor’s ability to produce key deliverables.

3) Delinquency status of borrowers currently enrolled in an IDR plan, broken down by plan, servicer, state, race, and gender.

The FSA Data Center report, DL Delinquency by Repayment Plan, shows delinquency rates for all repayment plans, including IDR plans.

Part E: Forbearances and Deferments

1) Number of borrowers enrolled in an IDR plan who were placed in a forbearance or deferment, broken down by IDR plan, year, servicer, type of forbearance or deferment, duration of forbearance or deferment, state, race, and gender.
Not in FSA systems. No records.

Part F: Paid Loans

1) Number of borrowers who were enrolled in an IDR plan and paid their loans in full, broken down by IDR plan, whether the borrower has graduate loans, year, servicer, state, race, and gender.

| Number of Borrowers* That Left IDR Who Paid in Full |
|-----------------|-----------------|-----------------|
| FY19 Q1         | FY19 Q2         | FY19 Q3         |
| Paid in Full    | 36,000          | 40,000          | 41,000          |

*Rounded to the nearest thousand borrowers

2) Data on loans where borrowers were enrolled in an IDR plan and paid their loans in full, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by IDR plan, whether the borrower has graduate loans, servicer, state, race, and gender.

Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate data requested. Would result in significant disruption of contractor’s ability to produce key deliverables.

3) Number of borrowers who were enrolled in an IDR plan and had their loans forgiven through a cancellation program (including but not limited to Total and Permanent Disability, Death, closed school, borrower defense, false certification, Public Service Loan Forgiveness), broken down by IDR plan, whether the borrower has graduate loans, year, servicer, forgiveness program, state, race, and gender.

| Number of Borrowers Who Left IDR in Indicated Quarter Who Have Received a Discharge |
|-----------------|-----------------|-----------------|-----------------|
| FY19Q1          | FY19Q2          | FY19Q3          |
| Discharges      | 11,000          | 11,000          | 13,000          |

Discharges include bankruptcy, closed school, death, disability, and false certification discharges. Borrower counts rounded to the nearest thousand.

4) Data on loans where borrowers who were enrolled in an IDR plan and had their loans forgiven through a cancellation program, including the number of loans, total balance (with principal and interest itemized), total original balance, and the total amount collected, broken down by IDR plan, whether the borrower has graduate loans, servicer, forgiveness program, state, race, and gender.

Unduly Burdensome. Estimated 853 hours for servicers to query, test, review and validate data being requested. Would result in significant disruption of contractor’s ability to produce key deliverables.
5) Number of borrowers who were enrolled in an IDR plan when they consolidated the loan that was in IDR, broken down by IDR plan, whether the borrower has graduate loans, year, and servicer, state, race, and gender.

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<thead>
<tr>
<th>Number of Borrowers Who Left IDR in Indicated Quarter Who Consolidated</th>
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<tr>
<td></td>
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<tr>
<td>IDR Borrowers Who Consolidated</td>
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**Business Operations Change Request Form**

As Of: 12/14/17 2:04:06PM

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**Title:** "IDR Progress toward Forgiveness" Record Type

**Sponsor:** Eric Hardy

**Business Analyst:** Denise Merchant

**Anticipated Implementation Date:** 05/20/2018

<table>
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<th>Change Request Details</th>
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<tr>
<td>Reason (Business Need):</td>
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</table>

Federal Student Aid would like to ensure that accurate and complete reporting of "Income-Driven Repayment (IDR) toward Forgiveness" is reflected in the NSLDS. To allow for more effective reporting by Federal Loan Servicers (FLS) to the NSLDS, NSLDS shall add a new record type specific to reporting of IDR Progress towards Forgiveness. Federal Student Aid shall also provide reporting rules in this CR to give direction to the FLS for consistent reporting in the new record type.
Description (Requirements):

*Also Attached as a Word Document
*NSLDS & FLS please read all the way through.

NSLDS Requirements

1. NSLDS shall create a new record type to collect monthly reporting of Income Driven Repayment (IDR) Progress toward Forgiveness.
   a. NSLDS shall allow federal loan servicers to report the new record type through batch reporting
      i. See Reporting Rules for IDR Progress toward Forgiveness Record Type for additional details
   b. NSLDS shall allow the federal loan servicer to view, create, delete, or modify all individual reporting of IDR Progress toward Forgiveness using Online Loan Update
      i. See Reporting Rules for IDR Progress toward Forgiveness Record Type for additional details
   c. NSLDS shall create DPI Change Pages detailing the new IDR Progress toward Forgiveness Record Type
   d. NSLDS shall create Help Text for Online Loan Update support of the new IDR Progress toward Forgiveness Record Type

2. NSLDS shall retain history of all reporting of IDR Progress toward Forgiveness
   a. NSLDS shall store and update IDR Progress toward Forgiveness in a new table
   b. NSLDS shall store and retain history of all reporting of IDR Progress toward Forgiveness in a new table
   c. NSLDS shall store IDR Progress toward Forgiveness to allow users to easily identify and retrieve the most recent reporting of IDR Progress toward Forgiveness

3. NSLDS shall retire the existing IDR Payment Counter fields
   a. NSLDS shall treat the existing Payment Counter fields (AQ-009, AQ-010, AR-009, AR-010) as filler (not error on any values reported in those fields positions) and cease to record data reported by the federal loan servicers

4. NSLDS shall include the IDR Progress toward Forgiveness record type in the Loan Information for Servicing (LIS) File.

Federal Loan Servicers Requirements

1. Federal loan servicers shall report IDR Progress toward Forgiveness to NSLDS
   a. Federal loan servicers shall report IDR Progress toward Forgiveness to NSLDS in a new record type
   b. See Reporting Rules for IDR Progress toward Forgiveness Record Type

2. Federal loan servicers shall initially populate NSLDS, following implementation, with any loan in an open status that has one count in any one of the Cumulative Progress fields

3. Federal loan servicers shall continue to report the IDR Progress toward Forgiveness record type upon any one counter changing

The NSLDS Contractor and the Federal loan servicers will provide two assessments.

1. Assessment #1 including all fields

2. Assessment #2 omitting the following fields:
   a. IBR Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s)
   b. PAYE Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s)
   c. REPAYE Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s)
   d. ICR Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s)

Reporting Rules for IDR Progress toward Forgiveness Record Type

This record type will be designed with both optional and required fields. The record type should be triggered by a change in any value in any of the Progress-related fields. If no change has occurred, the servicer is not expected to report the record
Typically, this record type will always be forward moving in terms of the "As Of" date but may be reset (delete all prior reporting) by reporting default values in all fields except the Award ID. This is only expected to occur when attempting to correct misrepresented data. The "As Of" date reported should never be earlier than a prior reported "As Of" date.

Reporting of the IDR Progress toward Forgiveness record type is not predicated on reporting of a specific repayment plan on the Repayment Term (AM) record type. Servicers will report an IDR Progress toward Forgiveness Record Type anytime the servicers has calculated or identified any progress greater than zero (including progress captured from the EA27 or the EA27 Supplemental File) months or anytime the progress from a prior reporting has changed. Regardless of current repayment plan (including borrowers which have left IDR all-together), servicers are determining if a payment or deferment is applicable toward Progress under all IDR plans. Servicers will continue to report Progress to all applicable plans regardless of the loan's existing repayment plan.

FFELP loans do not have progress in PAYE, REPAYE or ICR. If reporting progress for a FFELP loan in IBR, the servicer will report default values in all plans except the IBR-related fields.

If a loan is paid-in-full (borrower payoff, consolidation payoff, etc.) prior to forgiveness, the progress should not be updated to zero progress.

A loan is considered to have progressed toward forgiveness when a due date is covered by one of three activities on the loan:
- Qualifying payment for a qualifying month - a payment, or sum of payments, has been made that satisfies the amount due on a due date in a month and the due date has elapsed; this should increment monthly as the due dates pass, not multiple months at one time.
- $0 IDR payments - the due date for which the calculated (scheduled) IDR payment amount is $0 passes; this should increment monthly as the due dates pass, not multiple months at one time.
- Economic Hardship Deferment for a qualifying month - a period of Economic Hardship Deferment which covers the due date (This should increment monthly as the due dates pass, not multiple months at one time.)

IDR Progress toward Forgiveness Record Type
- Award ID
- "As of" Date — date on which the record is effective
  - Suggested to use the Extract or Reporting date
  - Should always be a date that moves forward regardless of increased or decreased values in other fields
- IBR Maximum Repayment Term in Months — Total qualifying months of payments or deferments required for forgiveness under the IBR or IBR2014 plans
  - The value should always be 240 or 300
- IBR Progress Earned toward Forgiveness — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the IBR or IBR2014 plans
  - Includes Progress Earned toward Forgiveness at Prior Servicer(s)
  - Includes qualifying payments for a qualifying month
  - Includes $0 payment counts but should not be reported in this field until the due date for a qualifying month has passed
  - Includes periods of economic hardship deferment but should not be reported in this field until the due date for a qualifying month has passed
  - Includes adjustments (up or down) made to Progress Earned toward Forgiveness at Prior Servicers
  - Loans where delinquency is resolved by payments from the borrower should be included as progress where the qualifying months which were past due have been satisfied by the payment
  - Pre-payments will not be reported until the due date for the qualifying month has passed
- IBR Progress Earned toward Forgiveness at Prior Servicer(s) — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the plan made to a prior servicer(s)
  - Typically, counts will be provided discretely by the prior servicer in the EA27 or the EA27 Supplemental File
  - Includes qualifying payments made to the prior servicer(s)
  - Includes $0 payments made to the prior servicer(s)
- IBR Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s) - Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the IBR or IBR2014 plans made to a prior servicer(s) that has been adjusted by the current servicer
  - Typically, will be populated when a review is conducted on an individual account to determine that adjustment is need to the initial counts of IBR Cumulative Progress Earned toward Forgiveness at Prior Servicer
- **PAYE Maximum Repayment Term in Months** — Total qualifying months of payments or deferments required for forgiveness under the PAYE plan
  - The value should always be 240
- **PAYE Progress Earned toward Forgiveness** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the PAYE plan
  - Includes Progress Earned toward Forgiveness at Prior Servicer(s)
  - Includes qualifying payments for a qualifying month
  - Includes $0 payment counts but should not be reported in this field until the due date for a qualifying month has passed
  - Includes periods of economic hardship deferment but should not be reported in this field until the due date for a qualifying month has passed
  - Includes adjustments (up or down) made to Progress Earned toward Forgiveness at Prior Servicer(s)
  - Includes qualifying months covered by an economic hardship deferment while at the prior servicer
- **PAYE Progress Earned toward Forgiveness at Prior Servicer(s)** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the PAYE plan made to a prior servicer(s)
  - Typically, counts will be provided discretely by the prior servicer in the EA27 or the EA27 Supplemental File
  - Includes $0 payments made to the prior servicer(s)
- **PAYE Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s)** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the PAYE plan made to a prior servicer(s) that has been adjusted by the current servicer
  - Typically, will be populated when a review is conducted on an individual account to determine that adjustment is needed to the initial counts of PAYE Cumulative Progress Earned toward Forgiveness at Prior Servicer
- **REPAVE Maximum Repayment Term in Months** — Total qualifying months of payments or deferments required for forgiveness under the REPAVE plan
  - The value should always be either 240 or 300
- **REPAVE Progress Earned toward Forgiveness** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the REPAVE plan
  - Includes Progress Earned toward Forgiveness at Prior Servicer(s)
  - Includes qualifying payments for a qualifying month
  - Includes $0 payment counts but should not be reported in this field until the due date for a qualifying month has passed
  - Includes periods of economic hardship deferment but should not be reported in this field until the due date for a qualifying month has passed
  - Includes adjustments (up or down) made to Progress Earned toward Forgiveness at Prior Servicer(s)
  - Includes qualifying months covered by an economic hardship deferment while at the prior servicer
- **REPAVE Progress Earned toward Forgiveness at Prior Servicer(s)** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the REPAVE plan made to a prior servicer(s)
  - Typically, counts will be provided discretely by the prior servicer in the EA27
  - Includes $0 payments made to the prior servicer(s)
- **REPAVE Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s)** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the REPAVE plan made to a prior servicer(s) that has been adjusted by the current servicer
  - Typically, will be populated when a review is conducted on an individual account to determine that adjustment is needed to the initial counts of REPAVE Cumulative Progress Earned toward Forgiveness at Prior Servicer
- **ICR Maximum Repayment Term in Months** — Total qualifying months of payments or deferments required for forgiveness under the ICR plan
  - The value should always be 300
- **ICR Progress Earned toward Forgiveness** — Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the ICR plan
  - Includes Progress Earned toward Forgiveness at Prior Servicer(s)
  - Includes qualifying payments for a qualifying month
  - Includes $0 payment counts but should not be reported in this field until the due date for a qualifying month has passed
  - Includes periods of economic hardship deferment but should not be reported in this field until the due date for a
qualifying month has passed
  o Includes adjustments (up or down) made to Progress Earned toward Forgiveness at Prior Servicers
  o Loans where delinquency is resolved by payments from the borrower should be included as progress where the qualifying months which were past due have been satisfied by the payment
  o Pre-payments will not be reported until the due date for the qualifying month has passed
• ICR Progress Earned toward Forgiveness at Prior Servicer(s) – Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the ICR plan made to a prior servicer(s)
  o Typically, counts will be provided discretely by the prior servicer in the EA27 or the EA27 Supplemental File
  o Includes $0 payments made to the prior servicer(s)
  o Includes qualifying months covered by an economic hardship deferment while at the prior servicer
• ICR Cumulative Adjusted Progress Earned toward Forgiveness at Prior Servicer(s) - Accumulated count of earned qualifying months of payments or deferments required for forgiveness under the ICR plan made to a prior servicer(s) that has been adjusted by the current servicer
  o Typically, will be populated when a review is conducted on an individual account to determine that adjustment is needed to the initial counts of ICR Cumulative Progress Earned toward Forgiveness at Prior Servicer

IMPACTED SYSTEMS/SERVICES: NSLDS, TIVAS, NFPS, DMCS

Does this change require a new network connection
(Secure File Transfer Protocol is mandatory for all new connections)? No

IST Anticipated? No

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Validation - Artifacts and Corresponding Requirement IDs (Required for Services)
TBD

Artifacts Due Date: 03/18/2018          BU Reviewer: Lisa Walker
Reason (Business Need):

Summary of Change:

Adds a new income contingent repayment plan, called the Revised Pay As You Earn (REPAYE) plan, to 685.209 of the Direct Loan Regulations. The REPAYE plan is modeled on the Pay as You Earn (PAYE) repayment plan, with the exception of the PFH qualification and capping rules, and would be available to all Direct Loan student borrowers regardless of when the student borrowers received their Direct Loans.

To target the plan to the neediest borrowers, the REPAYE plan has several new features not in the PAYE plan:

- For married borrowers filing separately, the AGI of both the borrower and the spouse are used to calculate the monthly payment amount. A borrower, who is separated from his or her spouse or is unable to reasonably access their spouse's income, is not required to provide their spouse's AGI.

- For subsidized loans, if a borrower’s monthly payment is not sufficient to pay the accrued interest (negative amortization), the Secretary does not charge the borrower the remaining accrued interest for a period not to exceed three consecutive years from the repayment start date under the REPAYE plan, the same as under the PAYE plan. Following this three year period, under the REPAYE plan, the Secretary charges 50 percent of the remaining accrued interest on subsidized loans during periods of negative amortization.

- For unsubsidized loans (including Direct PLUS Loans made to graduate students), and for subsidized loans for which the borrower has become responsible for accruing interest due in accordance with Section 685.200(f) of the Direct Loan regulations, the Secretary charges 50 percent of the remaining accrued interest during periods of negative amortization and for subsidized loans that have lost interest subsidy due to SULA.

- A borrower whose loans being repaid under the REPAYE plan include only loans the borrower received as an undergraduate student or a consolidation loan that repaid only loans the borrower received as an undergraduate student may qualify for forgiveness after 20 years.

- A borrower whose loans being repaid under the REPAYE plan include a loan the borrower received as a graduate or professional student or a consolidation loan that repaid a loan received as a graduate or professional student may qualify for forgiveness after 25 years.

- After 20 or 25 years of qualifying repayment, as applicable, the remaining balance of the borrower’s loans that have not been repaid under the REPAYE plan is forgiven.

- For each year a borrower is in the REPAYE plan, the borrower’s monthly payment amount is recalculated based on income and family size information provided by the borrower. There is no cap on the monthly payment amount.

- If the borrower does not provide the income information needed to recalculate the monthly repayment amount, the borrower is removed from REPAYE and placed in an alternative repayment plan. The monthly payment amount under the alternative repayment plan equals the amount required to pay off the loan within 10 years from the date the borrower begins repayment.
under the alternative repayment plan, or by the end date of the 20 or 25 year REPAYE repayment period, whichever is earlier.

• The borrower may return to the REPAYE plan if the borrower provides the income and family size information for the period that the borrower was on the alternative repayment plan. If the payments the borrower was required to make under the alternative repayment plan are less than the payments the borrower would have been required to make under the REPAYE plan, the monthly REPAYE payment amount is adjusted to ensure that the excess amount owed by the borrower is paid in full by the end of the REPAYE repayment period.

• Payments made under the alternative repayment plan do not count toward Public Service Loan Forgiveness, but may count for forgiveness under the REPAYE plan or another income driven repayment plan if the borrower returns to the REPAYE plan or changes to another income driven repayment plan.

Description (Requirements):

NON DISCLOSURE STATEMENT AND RULES OF CONDUCT

All staff representatives of each impacted system / organization are reminded of the rules of conduct and terms and conditions as outlined in Non Disclosure Agreements when being granted access to certain United States Government documents or material containing sensitive but unclassified information, including proprietary data, interpretations and/or derivatives of such data provided by the Federal Student Aid (FSA) Contracting Office and/or entities other than the contracting parties. Information for this change includes sensitive information and other proprietary data such as, documents, memoranda, reports, deliberations, and draft regulations provided through Federal Student Aid Contracting Office. Staff representatives are being granted access to this sensitive but unclassified information (SUI) only as a courtesy by FSA for the purposes of awareness and proposal submissions for the timely implementation of the Revised Pay As You Earn Repayment Plan (REPAYE).

9/10/2015

There are [3] attachments to this CR:

Attached is the revised as of 09102015 REPAYE spreadsheet (which includes an intro section w/timeline of deliverables, requirements and Q & A) and the latest draft IDR form (provided on 9/1/2015 by servicers) that has entered clearance.

Attachment # 1 — Redlined Requirements for REPAYE in Excel file as of 09102015
Attachment # 2 — DRAFT IDR Repayment Plan Request form provided 09012015
Attachment # 3 — Redlined version of the CR as of 9/10/2015

Notes to all Contractors:

1. The implementation date for this CR is tied to the COD Release 14.3 thus the implementation date has moved from December 14, 2015 to December 16, 2015.

2. Servicers only are required to provide revised assessments for this revised CR. The CR changes are information only for all other contractors unless you can demonstrate that the requirements changes impact your functionality.

3. Servicers shall revise their assessments so that there is no impact to the December 2015 implementation. If these requirements changes cannot be implemented with the December 2015 implementation (Phase 1) then please indicate that you will implement the changes with Phase 2 by July 1, 2016. If you choose to implement these changes with Phase 2, your assessment must include all clean-up and reapplication needed to make the requirements effective as of the December 2015 implementation.

Federal Loan Servicers [TIVAS and NFPs]

1.101 The servicer shall provide the REPAYE plan to eligible borrowers.

See requirements for REPAYE in the attached Excel file

504/508 Compliance

1.200 All changes must be 504/508 compliant where applicable

Consolidators:

1.201 The consolidator shall provide the REPAYE plan to eligible borrowers

See requirements for REPAYE in the Consolidation tab of the attached Excel file

504/508 Compliance

1.300 All changes must be 504/508 compliant where applicable

COD

StudentLoans.gov

2.101 COD shall update all schemas to include the new REPAYE plan data elements needed
2.201 COD shall update StudentLoans.gov text in loan counseling, the repayment estimators (both versions – responsive and original), the IDR e-App (to flow through to the Federal Direct Consolidation Loan e-App), the glossary and other supporting pages (What to Expect, etc.) to include and describe the terms of REPAYE.

StudentLoans.gov — On-line Calculators
2.301 COD shall update labels, column headers, titles, etc., to include REPAYE (or other descriptor, to be determined by FSA) throughout repayment estimate displays throughout StudentLoans.gov.
2.302 COD shall update repayment estimate calculations to include REPAYE throughout StudentLoans.gov so that the projected poverty guideline amounts for future years (for which HHS has not issued guidelines amounts yet), and the income percentage factors (for ICR), are based on percentage increases that follow the Congressional Budget Office's estimation of inflation.
2.303 COD shall update the filing status selection to address married borrowers filing separately. The AGI of both the borrower and the spouse are used to calculate the monthly payment amount for REPAYE.

504/508 Compliance
2.500 All changes to StudentLoans.gov must be 504/508 compliant.

TEACH-ATS.ed.gov
3.100 COD shall update TEACH-ATS.ed.gov text in the Initial and Subsequent Counseling and the Agreement to Serve, and any other applicable text, to include and describe the terms of REPAYE.

NOTE: FSA/PLI will supply the approved revised Agreement to Serve and FSA will supply all other necessary text updates.

3.200 All changes to the TEACFH-ATS.ed.gov must be 504/508 compliant

NSLDS
4.100 See NSLDS requirements for REPAYE in the attached Excel file

TEACH Grant Exit Counseling
4.200 TEACH Grant Exit shall be updated to describe the terms of REPAYE.

504/508 Compliance
4.300 All changes to NSLDS.ed.gov and TEACH Grant Exit Counseling must be 504/508 compliant.

Financial Partner Data Mart
See requirements for REPAYE in the attached Excel file

StudentAid.gov
6.101 StudentAid.gov shall update information to include the new REPAYE plan.

504/508 Compliance
6.200 All changes to StudentLoans.gov must be 504/508 compliant.

PCAs
7.101 PCAs shall ensure the updated IDR form is provided to borrowers upon request

Does this change require a new network connection
(Secure File Transfer Protocol is mandatory for all new connections)? No

IST Anticipated/Post-implementation Validation: Yes 11/02/2015

FSA Service/System/Area Impacted

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Validation - Artifacts and Corresponding Requirement IDs (Required for Services)

Validation Artifacts will include IST, procedures, screen shots, and correspondence.

Artifacts Due Date: 12/14/2015
Your Loans Are Approaching Forgiveness

The loan(s) listed on the attached Loan Details Sheet may be forgiven within the next 6-7 months as a result of repaying your loan(s) under an Income-Driven Repayment Plan.

Actions You Need To Take

Please continue to make your scheduled monthly payments in order to qualify for forgiveness. Forgiveness of a student loan debt may be considered as reportable income for tax purposes. If your forgiveness amount is greater than or equal to $600, you will receive a 1099-C for the tax year in which the loan was forgiven.

To learn more about how this information may affect your tax return, consult a tax advisor or contact the IRS at 800-829-1040 or https://IRS.gov. The U.S. Department of Education’s Federal Identification Number, or EIN, is 52-1198289.

Additional Information

Our customer support team is ready and willing to answer any questions you may have. You can reach us by phone at the contact information listed above, or by email at CustomerService@MyCornerStoneLoan.org.

You can also access all your account details 24/7 through our online portal at https://MyCornerStoneLoan.org.

If you are an active Servicemember, we encourage you to reach out to us at the contact information listed below.

Sincerely,

CornerStone Customer Service
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</table>
You Have Received Forgiveness On Your Loan(s)

All outstanding principal and interest on the loan(s) listed on the enclosed Loan Detail sheet have been forgiven as a result of repaying your loan(s) under an Income-Driven Repayment Plan. You are no longer obligated to make payments on the loan(s) listed on the attached Loan Detail Sheet; however, you are still obligated to continue making payments on any loan(s) not listed in this letter.

Actions You Need To Take

Any student loan debt that has been forgiven may be reported as taxable income for the year in which it is forgiven. If your forgiveness amount is greater than or equal to $600.00 you will receive a 1099-C for the tax year.

To learn more about how this information may affect your tax return, please consult a tax advisor or contact the IRS at 800-829-1040 or https://irs.gov. The U.S. Department of Education’s Federal Identification Number, or EIN, is 52-1198289.

Additional Information

Our customer support team is ready and willing to answer any questions you may have. You can reach us by phone at the contact information listed above, or by email at CustomerService@MyCornerStoneLoan.org.

You can also access all your account details 24/7 through our online portal at https://MyCornerStoneLoan.org.

If you are an active Servicemember, we encourage you to reach out to us at the contact information listed below.

Sincerely,

CornerStone Customer Service

Enclosure
### Loan Detail

<table>
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<tr>
<th>Loan Program:</th>
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<td>«Interest_Rate30»</td>
<td>«Amount_Forgiven30»</td>
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</table>
The forgiveness date for your eligible loans in income-driven repayment plans is quickly approaching. Continue making your scheduled monthly payments, and the loans on the following page may be eligible for forgiveness on 10/16/2016.

In approximately six months, once you reach the forgiveness date and meet the forgiveness requirements, you’ll receive a notification of forgiveness from us. At that point, you’ll no longer be required to make payments on these loans—great news!

Please note that the Internal Revenue Service (IRS) treats student loan forgiveness as a form of debt cancellation and as a taxable source of income. If your student loan debt is forgiven, you’ll receive IRS form 1099-C, which provides the amount of debt forgiven on your Great Lakes-serviced student loans. If you have questions about this process, please contact the IRS or a tax advisor.

Keep in mind that if you have additional loans that are not listed as eligible for forgiveness, you’re still obligated to continue making payments on those loans. Contact us, or visit mygreatlakes.org/options if you’re having trouble making payments.

If you have any questions, please contact us—we’re here to help.

Sincerely,
Great Lakes Borrower Services

Review Your Account
Visit mygreatlakes.org to access your Great Lakes account 24/7. You can review your account balance, make payments, and manage your loans conveniently online.
A Snapshot of Your Great Lakes-Serviced Student Loans as of 05/09/2016

The following table lists loans referenced in this letter that may be eligible for forgiveness. You may have additional loans not displayed on this table. Please log into your account on mygreatlakes.org to view all of your account information.

<table>
<thead>
<tr>
<th>Lender</th>
<th>Lender ID</th>
<th>Loan Type</th>
<th>First Disbursement Date</th>
<th>Original Loan Balance</th>
<th>Current Interest Rate</th>
<th>Current Balance</th>
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<td>U.S. DEPARTMENT OF EDUCATION</td>
<td>741577</td>
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<td>6.30%</td>
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<td>888888</td>
<td>Direct Stafford</td>
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<td>$45,000.00</td>
<td>6.77%</td>
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**Loan Type**
The type of student loan you borrowed.

**First Disbursement Date**
The date the loan was first disbursed.

**Original Loan Balance**
The original amount of the loan you borrowed for school.

**Current Interest Rate**
Current interest rate on the loan.

**Current Balance**
The principal balance plus the interest that's built up so far, minus any principal payment or refunds received. Keep in mind, this is not your forgiveness amount.
Final Forgiveness Letter:

May 10, 2016

We’re excited to inform you that the outstanding balance on your eligible student loans, listed on the following table, has been forgiven. You’re no longer obligated to make payments on these loans.

Please note that the Internal Revenue Service (IRS) treats student loan forgiveness as a form of debt cancellation and as a taxable source of income. You’ll receive IRS form 1099-C, which provides the amount of debt forgiven on your Great Lakes-serviced student loans. If you have questions about this process, please contact the IRS or a tax advisor.

Keep in mind that if you have additional loans that are not listed as forgiven, you’re still obligated to continue making payments on those loans. Contact us, or visit mygreatlakes.org/options if you’re having trouble making payments.

If you have any questions, please contact us—we’re here to help.

Sincerely,

Great Lakes Borrower Services

What’s the 1099-C?

The 1099-C (usually sent in late January of the upcoming year) provides the amount of forgiven student loan debt and any other debt you may have canceled this year. You’ll be able to use that amount when you file your taxes next year.

Contact Us for Help or Make a Payment

mygreatlakes.org
Access account information, make payments, visit the Knowledge Center, or email us.

(800) 236-4300 or (608) 246-1700
TTY: 711
Monday - Friday 7:00 am – 9:00 pm CT

Payment address only. Please include your Great Lakes ID.
Great Lakes
PO Box 530229
Atlanta, GA 30353-0229

You can self-serve 24/7 online or by phone. Some calls may be monitored or recorded for quality assurance purposes.

GREAT LAKES EDUCATIONAL LOAN SERVICES, INC. | MYGREATLAKES.ORG
2401 INTERNATIONAL LANE | MADISON, WI 53794-2792
A Snapshot of Your Great Lakes-Serviced Student Loans as of 05/09/2016

The following table lists loans referenced in this letter that may be eligible for forgiveness. You may have additional loans not displayed on this table. Please log into your account on mygreatlakes.org to view all of your account information.

<table>
<thead>
<tr>
<th>Lender</th>
<th>Lender ID</th>
<th>Loan Type</th>
<th>First Disbursement Date</th>
<th>Original Loan Balance</th>
<th>Current Interest Rate</th>
<th>Forgiveness Amount</th>
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<tr>
<td>U.S. DEPARTMENT OF EDUCATION</td>
<td>Direct Stafford</td>
<td></td>
<td></td>
<td></td>
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</table>

**Loan Type**
The type of student loan you borrowed.

**First Disbursement Date**
The date the loan was first disbursed.

**Original Loan Balance**
The original amount of the loan you borrowed for school.

**Current Interest Rate**
Current interest rate on the loan.

**Current Balance**
The principal balance plus the interest that's built up so far, minus any principal payment or refunds received. Keep in mind, this is not your forgiveness amount.
ACTION NEEDED: Please continue to make payments until you receive notice of your forgiveness approval from us.

Account: F

Dear [Name],

Your federal student loans in Group [Group] will be eligible for forgiveness soon, because you have made payments according to the requirements of your [Repayment Plan]. As of the date of this letter, your last qualifying payment is due on [Due Date]. It is important that you continue making your scheduled monthly payments on time until you receive notice of your forgiveness approval from us.

Please note that we report forgiveness of any loan debt totaling $600 or more to the Internal Revenue Service (IRS) for the year the loans are forgiven. Once your loans are forgiven, we will send an IRS Form 1099-C to you identifying the total amount of your forgiven debt. The amount of the forgiven debt may be considered income for tax purposes. Consulting a tax professional may help you determine how this could affect your personal taxes. You may also contact the IRS at IRS.gov for more information.

For further assistance, please contact Customer Service at 1-888-556-0022. If you are calling after hours, please leave a voicemail or contact us via e-mail at dlcUSTOMERSEVGSMR.ORG.

Sincerely,

Your Education Partners at
Granite State Management & Resources
The NHHEAF Network Organizations
INFO: Your student loans in Group have been forgiven!

Account: 

Dear [Name],

Congratulations! Your federal student loans in Group have been forgiven. Because you repaid this loan group according to the requirements of your [Repayment Plan] you no longer have an obligation to repay the loans in this group. We have (or will by the end of the month) notified all national credit bureaus of your loan forgiveness.

Please note that we will report forgiveness of any loan debt totaling $600 or more to the Internal Revenue Service (IRS) for the year the loans are forgiven. As your loans are forgiven, we will send an IRS Form 1099-C to you identifying the total amount of your forgiven debt. The amount of the forgiven debt may be considered income for tax purposes. Consulting a tax professional may help you determine how this could affect your personal taxes. You may also contact the IRS at IRS.gov for more information.

For further assistance, please contact Customer Service at 1-888-556-0022. If you are calling after hours, please leave a voicemail or contact us via e-mail at dlcustomerservice@gsmr.org.

Sincerely,

Your Education Partners at
Granite State Management & Resources
The NHHEAF Network Organizations
FEBRUARY 29, 2016

Dear [Redacted]

Congratulations! Your federal student loan(s) has been forgiven! Because you repaid this loan group according to the requirements for your Income-Driven Repayment (IDR) plan, you are no longer required to repay this loan group as of the date of this letter. We have also notified the nationwide consumer reporting agencies of your loan forgiveness.

Please note that we will report forgiveness of any loan debt totaling $600.00 or more to the Internal Revenue Service (IRS) for the year in which the loan was forgiven. As your loan(s) is forgiven, we will send you an IRS Form 1099-C that identifies the total amount of your forgiven debt. The amount of the forgiven debt will be considered income for federal tax purposes and possibly for state tax purposes. Consulting a tax professional should help you determine how this may affect your personal taxes. You may also contact the Internal Revenue Service (IRS.gov) for more information.

If you have questions about your account, contact us at www.edfinancial.com/Contact or call us at 1.855.337.6884. Our hours of operation are Monday through Thursday 8:00 a.m. to 8:30 p.m. and Friday 8:00 a.m. to 6:00 p.m. ET. Our automated voice response system is available 24 hours a day.

Sincerely,

Edfinancial Services
Account Number: [Redacted]

ACTION NEEDED: Please continue to make payments until your official forgiveness dates.

Dear [Redacted]

Your federal student loan(s) in Group A will be eligible for forgiveness soon! Your loan(s) is being forgiven because you have made payments according to the requirements for your Income-Driven Repayment (IDR) plan. As of the date of this letter, your last qualifying payment is due on 08/29/2016. It is important that you continue making your scheduled monthly payments on time until the date of your forgiveness.

Please note that we report forgiveness of any loan debt totaling $600 or more to the Internal Revenue Service (IRS) for the year in which the loan balance was forgiven. Once your loan(s) is forgiven, we will send you an IRS Form 1099-C that identifies the total amount of your forgiven debt. The amount of the forgiven debt will be considered income for federal tax purposes and possibly for state tax purposes. Consulting a tax professional will help you determine how this may affect your personal taxes. You may also contact the Internal Revenue Service (IRS.gov) for more information.

If you have questions about your account, contact us at www.edfinancial.com/Contact or call us at 1.855.337.6884. Our hours of operation are Monday through Thursday 8:00 a.m. to 8:30 p.m. and Friday 8:00 a.m. to 6:00 p.m. ET. Our automated voice response system is available 24 hours a day.

Sincerely,

Edfinancial Services
CONGRATULATIONS, YOUR ENCLOSED LOANS HAVE BEEN FORGIVEN.

Eligible borrowers on income-driven repayment plans may receive loan forgiveness after 20 or 25 years. Your obligation on the enclosed loans is satisfied. This letter provides important information regarding how the forgiven amount may impact your income taxes.

- The balance of your loans that were forgiven is considered taxable income for income tax purposes. MOHELA will file a 1099-C with the Internal Revenue Service (IRS) for borrowers with a total discharged amount of $600.00 or more. Please contact the IRS for more information and see your tax advisor regarding how to use this information.
- If you have multiple loans that you began repaying on different dates, please read the enclosed loan information closely. Your other loans may not be listed here because more time remains before they may be forgiven. If you have loans that are not included here, please continue to make payments on them.
- For information regarding your loans and the forgiveness process, please contact us.
# LOAN INFORMATION SECTION

<table>
<thead>
<tr>
<th>LOAN PROGRAM</th>
<th>DISBURSEMENT DATE</th>
<th>CURRENT PRINCIPAL BALANCE</th>
<th>INTEREST RATE</th>
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<td>XXXXXXXX</td>
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<td>XX1111</td>
</tr>
</tbody>
</table>
YOU ARE ALMOST THERE! Congratulations, you are nearing the date that you are expected to meet the requirements for loan forgiveness on your enclosed federal student loans. Eligible borrowers on an income-driven repayment plan may receive loan forgiveness after 20 or 25 years.

This letter provides important information about loan forgiveness, including your estimated forgiveness date and how the forgiven amount may impact your income taxes.

Your estimated forgiveness date for the enclosed loans is XXXXXXXXXX.

WHAT ACTIONS YOU NEED TO TAKE

• Continue to make your scheduled monthly payments on time until you receive notification that your loans have been forgiven.
• You must remain on a qualifying repayment plan including Income-Based Repayment (IBR), Income-Contingent Repayment (ICR), Pay As You Earn (PAYE), Revised Pay As You Earn (REPAYE) or the Standard (10-year) Repayment Plan. Changing repayment plans may change your estimated forgiveness date.
• Any month that you are in an Economic Hardship Deferment generally counts as the equivalent of a qualifying monthly payment for purposes of the income-driven repayment plans. However, other deferments and forbearances do not count toward your loan forgiveness period.

ADDITIONAL INFORMATION YOU MAY FIND HELPFUL

• The balance of your loans which are forgiven is considered taxable income for income tax purposes. MOHELA will file a 1099-C with the Internal Revenue Service (IRS) for borrowers with a total discharged amount of $600.00 or more. Please contact the IRS for more information and see your tax advisor regarding how to use this information.
• If you have multiple loans that you began repaying on different dates, please read the enclosed loan information closely because they may have different forgiveness dates. If you have loans that are not included here, please continue to make on-time payments on them.
• For information regarding your loans and the forgiveness process, please contact MOHELA.
## LOAN INFORMATION SECTION

<table>
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<tr>
<th>LOAN PROGRAM</th>
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<td>Xxxxxx</td>
<td>Xxxxxxxxxxxxxxxxxx</td>
<td>Xxxxxx</td>
</tr>
</tbody>
</table>
<First Name>, in six months your eligible federal loan(s) may qualify for forgiveness.

**What you need to do**
Keep making your scheduled monthly payment for the next six months.

We’ll notify you once you’ve satisfied the loan forgiveness requirements. At that point, you will no longer be required to make payments toward the eligible loan(s).

**What you need to know**
A loan forgiveness benefit received by a borrower may have income tax implications. Under the current Internal Revenue Code and related Department of Treasury regulations, amounts forgiven, such as the remaining loan balance at the end of your repayment period under an income-driven repayment plan, constitute income for which income tax may be due. For more information, you should check with the IRS at www.irs.gov or consult your tax advisor.

**We’re here to help**
Visit us online at Navient.com or give us a call at 800-722-1300, Monday – Thursday 8 a.m. to 9 p.m., and Friday 8 a.m. to 8 p.m., ET.

[Include Loan Level Information]
<First Name>, your eligible federal loans have qualified for forgiveness.

Your loan forgiveness determination has been made, and the repayment obligation on the forgiven loan(s) below is satisfied. Any payments you may have made after the determination will be returned to you shortly.

You are no longer required to make payments toward the eligible loans.

What you need to know
A loan forgiveness benefit received by a borrower may have income tax implications. Under the current Internal Revenue Code and related Department of Treasury regulations, amounts forgiven, such as the remaining loan balance at the end of your repayment period under an Income-Driven Repayment plan, constitute income for which income tax may be due. For more information, you should check with the IRS at www.irs.gov or consult your tax advisor.

We're here to help
Visit us online at Navient.com or give us a call.

Important disclosure(s)

Servicing of federal student loans
Your federal student loans referenced in this letter are owned by the U.S. Department of Education. The terms of the federal student loan programs are not determined by Navient, they are established by federal law, in particular by the Higher Education Act of 1965, as amended, and U.S. Department of Education regulations. Among other things, the law and regulations set borrowing limits, interest rates, eligibility for subsidies, repayment plans, capitalization of interest, and loan forgiveness. As your loan servicer, Navient is required to administer your loans on behalf of the U.S. Department of Education in accordance with the law.
Loan Information. The loans listed below are the loans referred to in this letter. If you have questions or concerns about your account, write to us at the address provided above.

<table>
<thead>
<tr>
<th>LOAN DATE</th>
<th>ORIGINAL LOAN AMOUNT</th>
<th>OUTSTANDING PRINCIPAL</th>
<th>INTEREST RATE</th>
<th>LOAN PROGRAM</th>
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INFO: Your student loans in Group D have been forgiven!

Account: (b)(6)

Dear (b)(6)

Congratulations! Your federal student loans in Group D have been forgiven. Because you repaid this loan group according to the requirements of your Revised Pay As You Earn Repayment Plan, you no longer have an obligation to repay the loans in this group. We have (or will by the end of the month) notified all national credit bureaus of your loan forgiveness.

Please note that we will report forgiveness of any loan debt totaling $600 or more to the Internal Revenue Service (IRS) for the year the loans are forgiven. As your loans are forgiven, we will send an IRS Form 1099-C to you identifying the total amount of your forgiven debt. The amount of the forgiven debt may be considered income for tax purposes. Consulting a tax professional may help you determine how this could affect your personal taxes. You may also contact the IRS at IRS.gov for more information.

Just know that we’re here for you when you need us. If you have any questions, please visit Nelnet.com or call us at 888.486.4722.

Sincerely,

Your Nelnet Customer Service Team
MARCH 28, 2016

ACTION NEEDED: Please continue to make payments until you receive notice of your forgiveness approval from us.

Account: (b)(6)

Dear (b)(6)

Your federal student loans in Group A will be eligible for forgiveness soon, because you have made payments according to the requirements of your Income Based Repayment Plan. As of the date of this letter, your last qualifying payment is due on 12/15/17. It is important that you continue making your scheduled monthly payments on time until you receive notice of your forgiveness approval from us.

Please note that we report forgiveness of any loan debt totaling $600 or more to the Internal Revenue Service (IRS) for the year the loans are forgiven. Once your loans are forgiven, we will send an IRS Form 1099-C to you identifying the total amount of your forgiven debt. The amount of the forgiven debt may be considered income for tax purposes. Consulting a tax professional may help you determine how this could affect your personal taxes. You may also contact the IRS at IRS.gov for more information.

Just know that we're here for you when you need us. If you have any questions, please visit Nelnet.com or call us at 888.486.4722.

Sincerely,

Your Nelnet Customer Service Team
INFO: Your Group [~GR] student loans have been forgiven!

Account: [F][XXXXXXXXX]

Dear [First_Name],

Congratulations! Your federal student loans in Group [~GR] have been forgiven! Because you repaid this loan group according to the requirements for your income-driven repayment plan, you are no longer required to repay them as of the date of this letter. All national credit bureaus have been notified of your loan forgiveness.

Please note that forgiveness of any loan debt totaling $600.00 or more will be reported to the Internal Revenue Service (IRS) for the year that the loan was forgiven. As your loans are forgiven, we will send you an IRS Form 1099-C that identifies the total amount of your forgiven debt. The amount of the forgiven debt will be considered income for federal tax purposes and possibly for state tax purposes. Consulting a tax professional should help you determine how this may affect your personal taxes. You may also contact the Internal Revenue Service (IRS.gov) for more information.

If you have any questions concerning your loan or this correspondence, you may contact a servicing team member at (866) 264-9762 or DLcustserv@osla.org. At our website, https://public.OSLA.org, look for Direct Loan Login. There, you may view your loan information and/or enroll in an automated payment program (KwikPay). OSLA is pleased to service your student loan, and we are committed to providing you exceptional customer service.

Sincerely,

OSLA Student Loan Servicing
August 23, 2019

[First_Last_Name]  
[Address]  
[City, ST ZIP]

ACTION NEEEDED: Please continue to make payments until your official forgiveness date.

Account: [F][XXXXXXXXX]

Dear [First_Name],

Your federal student loans in Group [~GR] will be eligible for forgiveness soon! Your loans are being forgiven because you have made payments according to the requirements for your income-driven repayment plan. As of the date of this letter, your last qualifying payment is due on [IDR – LAST PMT]. It is important that you continue making your scheduled monthly payments on time until the date of your forgiveness.

Please note that forgiveness of any loan debt totaling $600 or more will be reported to the Internal Revenue Service (IRS) for the year that the loan was forgiven. Once your loans are forgiven, we will send you an IRS Form 1099-C that identifies the total amount of your forgiven debt. The amount of the forgiven debt will be considered income for federal tax purposes and possibly for state tax purposes. Consulting a tax professional will help you determine how this may affect your personal taxes. You may also contact the Internal Revenue Service (IRS.gov) for more information.

If you have any questions concerning your loan or this correspondence, you may contact a servicing team member at (866) 264-9762 or DLcustserv@osla.org. At our website, https://public.OSLA.org, look for Direct Loan Login. There, you may view your loan information and/or enroll in an automated payment program (KwikPay). OSLA is pleased to service your student loan, and we are committed to providing you exceptional customer service.

Sincerely,

OSLA Student Loan Servicing
YOUR LOANS HAVE BEEN FORGIVEN!

Your loans, listed below, were on Income-Driven Repayment (IDR) plan. As a result of you making the required qualifying payments, these loans have been forgiven.

Congratulations, this means that you have satisfied your obligation on these loans!

Was $600 or more forgiven?

If $600 or more was forgiven, we will send you an IRS Form 1099-C Cancellation of Debt notice. We are also required to report this cancellation to the IRS because you may have to pay federal income tax on it. Please contact the IRS for more information about how this cancellation of debt affects your income tax.
## Loan Information

<table>
<thead>
<tr>
<th>Loan Program</th>
<th>Disbursement Date</th>
<th>Current Principal Balance</th>
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</table>
YOUR LOANS ARE ALMOST ELIGIBLE FOR FORGIVENESS!

Your loans, listed below, are currently on Income-Driven Repayment (IDR) plan. One benefit of IDR is that your qualifying payments lead to loan forgiveness. Your loans are less than six months away from being forgiven!

GOOD NEWS! Continue to make the monthly payment amount listed on your bill each month and the anticipated date for forgiveness on the loans listed below will be XXXXXXXX.

- If $600 or more is forgiven, we will send you an IRS Form 1099-C Cancellation of Debt notice. We are also required to report this cancellation to the IRS because you may have to pay federal income tax on it. Please contact the IRS for more information about how this cancellation of debt affects your income tax.

- For more information on IDR, please visit MyFedLoan.org/IDRFAQ.
# LOAN INFORMATION

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