

# MOHELA Return to Repayment Communications Playbook

V14 – 10/11/2023

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## Introduction

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

## Overarching Communications Approach

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

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

## Outreach Volume

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

## Outreach related to ACH/Auto Debit

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

## May 2023

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

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

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

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

## June 2023

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

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

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

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

## July 2023

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

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

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

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

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

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

## COMMUNICATION PAUSE FOR NEW IDR FLOW LAUNCH

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

## August 2023

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

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

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

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

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

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

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

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

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

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

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

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

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

## September 2023

*System and CR-related communications:*

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

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

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

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

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

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

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

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

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

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

## October 2023

*System and CR-related communications:*

*Bills continue for payments due*

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

*Resume required due diligence*

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

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

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

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

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

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

## November 2023

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

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

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

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

## December 2023

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

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

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

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

## January 2024

*System and CR-related communications:*

### *On-Ramp Program communication*

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

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

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

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

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

## February 2024

*System and CR-related communications:*

### *On-Ramp Program communication*

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

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

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

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

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

Status	Pending
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## March 2024

*System and CR-related communications:*

### *On-Ramp Program communication*

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

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

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

Method	Website
Status	Pending

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

## April 2024

*System and CR-related communications:*

### *On-Ramp Program communication*

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

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

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

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

## May 2024

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

## June – October 2024

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

### Change Log

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



October 16, 2023

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Approximately 3 minutes.

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

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

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

Approximately 38 minutes.

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

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

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

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

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

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

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

Current average email response time is approximately 11 business days.

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

Over 33,000.

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

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

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

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

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

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

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

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

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

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

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

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

Approximately 1 hour.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MOHELA utilizes FSA's suggested scripting:

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

Here's what this means:

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

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

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

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

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

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

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

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

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

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

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

The current Communication Playbook is included as requested.

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

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

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

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

Sincerely,  
MOHELA