

October 11, 2023

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

The Honorable Chris Van Hollen United States Senator 730 Hart Senate Office Building Washington DC 20510 The Honorable Richard Blumenthal United States Senator 706 Hart Senate Office Building Washington, DC 20510

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

RE: Edfinancial Response to letter dated September 27, 2023

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

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

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

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

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

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

Customer Inbound Communications.

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

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

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

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

Department of Education Initiatives and Guidance

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

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

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

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

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

Edfinancial's Performance

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

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

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

Sincerely,

Edfinancial Services



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

Federal Student Aid's Outreach Plan to Borrowers

September 28, 2023

Version 24

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Overview

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

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

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

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

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

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

Main Return to Repayment Communication Segments

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

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

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

At-Risk Segment

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

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

Soon to Make Payments Segment

pause (TEDI)

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

	Segment
Will exit the grace period after the payment pause	

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

In Previous Good Standing Segment

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

Segment In good standing and on an IDR Plan, including those that have recertified or recalculated their monthly payments during the payment pause

In good standing and on any (non-IDR) repayment plan

Currently Making Payments Segment

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

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

No Payment Due Segment

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

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

Fresh Start Segment

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

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

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

Main Student Debt Relief Communication Segments

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

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

Main Income-Driven Repayment Communication Segments

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

Communication Schedule

Outreach related to ACH/Auto-Debit

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

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

June 2023

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

Servicer – R2R Focus	
Title 1	Return to Repayment Date Confirmation
Description 1	Servicers should put the following banner on their website and IVR.
	Website/IVR: 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.
	Borrowers will receive a billing statement from their loan servicer at least three weeks before their payment is due.
	the weeks before their payment is ulle.
Audience 1	All borrowers

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

July 2023

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

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

Federal Student Aid – IDR Focus	
Title 1	Announcing SAVE

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

COMMUNICATION PAUSE FOR NEW IDR FLOW LAUNCH

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

August 2023

Federal Student Aid – R2R Focus	
Title 1	Payments are resuming soon

Description 1	Focus on preparing borrowers for disclosures, billing statements, and to
	start making payments soon. Also encourage to sign up for auto-debit and
	for IDR (SAVE). Personalization made to borrowers based upon population
	segment.
Audience 1	At Risk
Expected Date for	July 28, 2023
Finalized Content	
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
Wethou	
Title 2	Payments are resuming soon
Description 2	Focus on preparing borrowers for disclosures, billing statements, and to
	start making payments soon. Also encourage to sign up for auto-debit and
	for IDR (SAVE). Personalization made to borrowers based upon population
	segment.
Audience 2	Soon to make Payments
Expected Date for	July 28, 2023
Finalized Content	Suly 20, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
Method	
Title 3	Payments are resuming soon
Description 3	Focus on preparing borrowers for disclosures, billing statements, and to
Description 5	start making payments soon. Also encourage to sign up for auto-debit and
	for IDR (SAVE). Personalization made to borrowers based upon population
	segment.
Audience 3	In Previous Good Standing
Expected Date for	July 28, 2023
Finalized Content	July 28, 2023
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
Methou	E-IIIali
Title 4	Keep making your payments
Description 4	Informs borrowers who had opted out and were already making payments
Description 4	that they need to continue to make their payments. Inform them of the 0%
Audionae 4	interest rate ending.
Audience 4	Currently Making Payments
Expected Date for	July 28, 2023
Finalized Content	
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
Title 5	No payment due after the pause ends

Description 5	Inform borrowers who are expecting a full discharge of their loans or who will be entering into another forbearance or deferment that no payment will be required.
Audience 5	No Payment Due
Expected Date for	July 28, 2023
Finalized Content	
Start Date	August 28, 2023
End Date	September 1, 2023
Method	E-mail
Title 6	0% interest is ending, and interest resumes 9/1
Description 6	Informs borrowers that 0% interest rate is ending, and interest will resume
Description o	9/1. Incorporates previous Fresh Start email content.
Audience 6	Borrowers in Default
Expected Date for	July 28, 2023
Finalized Content	July 28, 2023
Start Date	August 7, 2023
End Date	August 11, 2023
Method	E-mail
Title 7	Reminder: Payments are resuming soon
Description 7	Additional reminder reinforcing the need for preparing borrowers for disclosures, billing statements, and to start making payments soon. Also encourage to sign up for auto-debit and for IDR (SAVE). Personalization made to borrowers based upon population segment.
Audience 7	 At-Risk populations to include: Did not complete program of study no matter school (for profit or not for profit) 30+ days delinquent immediately prior to the payment pause Borrowers who rehabilitated from default or opted into Fresh Start plus and transferred to a non-default servicer All remaining at-risk borrowers not in these three categories
Expected Date for Finalized Content	July 28, 2023
Start Date	September 5, 2023
End Date	September 7, 2023
Method	E-mail
Title 8	External Engagement Kick Off Event
Description 8	FSA will be engaging with external partners to promote the preparation for the resumption of payments.
	August 23, 2023 – Stakeholder call with White House Initiatives August 24, 2023 – White House OPE Faith Community Call TBD – K12 stakeholder call, Higher ED stakeholder call, and State/Local Partner call

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

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

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

Expected Date for	August 15, 2023 (August 18, 2023 for final formatted version of August 18
Finalized Content	version)
Start Date	August 18, 2023
End Date	August 26, 2023 (Saturday)
Method	Email
Title 3	What does the SAVE plan mean for me?
Description 3	Let them know about the new SAVE plan and that it might be a better
	option for their situation than their existing IDR plan. Potentially see a
	lower payment amount.
Audience 3	Borrowers currently on IDR, but not REPAYE
Expected Date for	July 28, 2023
Finalized Content	501 20, 2023
Start Date	August 14, 2023 (no weekend sends)
End Date	August 22, 2023
Method	Email
Wiethou	Eman
Title 4	What does the SAVE plan mean for me?
Description 4	Let them know about the new SAVE plan if they want to lower their
	monthly payment amount. Learn about benefits of SAVE.
Audience 4	
	Borrowers currently on the standard repayment plan
Expected Date for Finalized Content	July 28, 2023
	August 14, 2022 (no weakend conde)
Start Date	August 14, 2023 (no weekend sends)
End Date	August 22, 2023
Method	Email
Title 5	Comparing the new SAVE IDR Plan to Existing IDR Plans
Description 5	Public announcement showing the differences between the new and
	existing IDR plans showing calculations and expected savings
Audience 5	All borrowers
Expected Date for	To be determined
Finalized Content	
Start Date	August TBD, 2023
End Date	August TBD, 2023
Method	Social Media Posts
Title 6	Department of Education email promoting SAVE/IDR Beta launch
Description 6	Email to listserv subscribers from the Department of Education promoting
	SAVE/IDR Beta launch.
	Daily email sends with 1 million going on August 14, 3 million on August 15,
	and 3 million on August 16.
Audience 6	Individuals who have subscribed to an email notification listserv at ED
Expected Date for	August 14, 2023
Finalized Content	

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

September 2023

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

Description 4	Remind borrowers that they will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first
	payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 4	Soon to make Payments, but only focusing on those that will exit grace after
Fundated Data for	the payment pause
Expected Date for Finalized Content	September 17, 2023
	Contombor 10, 2022
Start Date	September 19, 2023
End Date	September 22, 2023
Method	E-mail
Title 5	Make sure you are prepared
Description 5	Sent to borrowers who will soon receive their first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 5	At-Risk populations to include:
Addience 5	• Did not complete program of study no matter school (for profit or not
	for profit)
	30+ days delinquent immediately prior to the payment pause
	Borrowers who rehabilitated from default or opted into Fresh Start plus and transferred to a non-default servicer
	All remaining at-risk borrowers not in these three categories
Expected Date for	September 6, 2023
Finalized Content	
Start Date	September 6, 2023
End Date	September 8, 2023
Method	E-mail
Title 6	Reminder Look out for your billing statement – Make sure you are prepared
Description 6	Additional reminder to borrowers that they have or will soon receive their
Description	first billing statement. Encourage them to seek help if they are unable to afford their first payment. Also encourage to sign up for auto-debit and for IDR (SAVE).
Audience 6	At-Risk populations to include:
	• Did not complete program of study no matter school (for profit or not for profit)
	• 30+ days delinquent immediately prior to the payment pause
	Borrowers who rehabilitated from default or opted into Fresh Start plus
	and transferred to a non-default servicer
	All remaining at-risk borrowers not in these three categories
Expected Date for	September 29, 2023
Finalized Content	
Start Date	October 4, 2023
End Date	October 6, 2023
Method	E-mail

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

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

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

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

October 2023

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

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

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

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

November 2023

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

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

December 2023

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

January 2024

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

February 2024

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

March 2024

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

On Ramp Program In-Depth

Program Summary

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

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

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

Messaging for Servicer Comms

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

CONSEQUENCES OF DELINQUENCY DURING ON RAMP PERIOD

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

Here's what this means:

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

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

Clarification on Requirement 8 on CR6703

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

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

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

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

 For borrowers in the TEDI audience who successfully make their student loan payment on time, FSA will send an email message of support before their next payment is due (1 email randomly assigned or no email at all). 2. For borrowers in the TEDI audience who miss their student loan payment, FSA will send a message providing information on how to get support and the risks of remaining delinquent before their next payment is due (10 different messages randomly assigned).

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

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

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

Role of Servicers in Relationship to TEDI

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

Planned Vendor Communications Beyond This Plan

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

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

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

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

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

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

Servicers are asked to provide their plan and communications to <u>FSACaresActComms@ed.gov</u> for review.

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

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

Website Content

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

Reporting Requirements

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

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

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

Deflection Messaging Outlines

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

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

Servicers may recommend edits to these messages if they are provided for review and approval to FSA via the <u>FSACaresActComms@ed.gov</u> mailbox.

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

Phase 1

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

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

Phase 2

Phase 3

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

Phase 4

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

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

Version Control

1Original Version7/3/20232Updated July email send to reflect additional email Updated dates for ACH Email7/3/20233Updated sets for ACH Email7/5/20233email, which was a duplicate of the July SDR email, and updating that deflection will focus on non-default borrowers7/6/20234Updated email send dates for July7/7/20235Updated email send dates for July & added in deflection messaging for the remainder of the R2R period7/11/20236Added details on IDR Forgiveness Opt Out Email7/22/20237Added details on the IDR Communications Pause7/14/20238from July to August. Reflected early July social media postings related to SAVE7/27/20239Clarified deflection messaging and updated send dates for August communications to TBD.7/28/202310Updated sem dates for and pause that we end date, August and september8/4/202311Updated Jugust send dates, and updated deflection messaging dates in August and September8/10/202313Updated duguate related to On Ramp, the communications pause, and beta email send dates8/10/202314Updated duguate on August send dates and ending of IDR communications pause tentative end date8/16/202316Updated duguate on August send dates and ending of IDR communication pause, and beta email send dates8/21/202316Updated details on the external engagement outreach expected the week of August 21, 2023. Also updated call deflection phase 2 dates to align with FSAs R2R email send from August 28 to September8/	Version	Description	Date
2 Updated dates for ACH Email 7/3/2023 3 Updating send dates for July SDR email, deleting out June SDR email, which was a duplicate of the July SDR email, and updating that deflection will focus on non-default borrowers 7/6/2023 4 Updated email send dates for July & added in deflection messaging for the remainder of the R2R period 7/11/2023 6 Added details on IDR Forgiveness Opt Out Email 7/12/2023 7 Added details on the IDR Communications Pause 7/14/2023 8 from July to August. Reflected early July social media postings related to SAVE 7/28/2023 9 Clarified deflection messaging and updated send dates for August communications to TBD. 7/28/2023 10 Updated August send dates for email communications and added Phase 2 deflection dates to align 7/28/2023 11 Updated IDR Comms Pause tentative end date, August and September email send dates, and updated deflection messaging dates in August and September 8/10/2023 13 Updated information on August send dates and ending of IDR communications pause tentative end date. 8/15/2023 14 Updated send dates for remaining August emails and updated IDR communications pause tentative end date. 8/16/2023 13 Updated information pause, and beta email send dates. 8/16/2023 <td>1</td> <td>Original Version</td> <td>7/3/2023</td>	1	Original Version	7/3/2023
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	22	Updates to September content delivery dates	9/17/2023

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