

United States Senate

WASHINGTON, DC 20510

December 1, 2023

The Honorable Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary Cardona:

We are writing regarding the Department of Education's ("ED" or "the Department") management of the return to student debt repayment.

On October 1, 2023, ED ended the over three year-long suspension of loan payments — initiated due to the COVID-19 pandemic — and began requiring student loans to be repaid.¹ The sudden restart of tens of millions of student loan payments is unprecedented and creates serious risks for borrowers.² Research shows that borrowers face a high risk of delinquency and default when exiting forbearance, even after payment pauses of much shorter lengths than this one.³ The student loan system bears an enormous burden in supporting borrowers as they return to repayment, especially given that federal funding for the Department of Education's Office of Federal Student Aid (FSA) has remained stagnant⁴ while FSA's responsibilities have increased significantly.⁵ FSA is tasked with making long-overdue improvements to the student loan system, while also overseeing student loan servicers as they support borrowers in returning to

¹ POLITICO, "Biden admin will resume interest on federal student loans Sept. 1; monthly payments due in October," Michael Stratford, June 12, 2023, <https://www.politico.com/newsletters/weekly-education/2023/06/12/biden-admin-will-resume-interest-on-federal-student-loans-sept-1-monthly-payments-due-in-october-00101431>; Fiscal Responsibility Act of 2023, Public Law 118-5, Title IV, Sec. 271.

² AP News, "The pause on student loan payments is ending. Can borrowers find room in their budgets?," Collin Binkley, June 8, 2023, <https://apnews.com/article/student-loan-payment-pause-end-642276f724b30890669a60ea2c0bbfd5>; Consumer Financial Protection Bureau, "Report of the CFPB Education Loan Ombudsman," October 2021, p. 4, https://files.consumerfinance.gov/f/documents/cfpb_education-loan-ombudsman-annual-report_2021.pdf.

³ State of Nebraska v. Biden (8th Circuit, 2023), Exhibit A, "Rationale for Pandemic-Connected Loan Discharge Program," p. 2. <https://www.courtlistener.com/docket/65385675/27/1/state-of-nebraska-v-biden/>.

⁴ Inside Higher Ed, "Federal Student Aid Funding Woes Complicate Resuming Student Loan Payments," Katherine Knott, May 11, 2023, <https://www.insidehighered.com/news/government/student-aid-policy/2023/05/11/federal-student-aid-funding-woes-complicate-resuming>.

⁵ The White House, "FACT SHEET: President Biden Announces Student Loan Relief for Borrowers Who Need It Most," August 24, 2022, <https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/24/fact-sheet-president-biden-announces-student-loan-relief-for-borrowers-who-need-it-most/>; U.S. Department of Education, "Department of Education Announces Actions to Fix Longstanding Failures in the Student Loan Programs," press release, April 19, 2022, <https://www.ed.gov/news/press-releases/department-education-announces-actions-fix-longstanding-failures-student-loan-programs>.

repayment or entering repayment for the first time.⁶ Given this challenging context, we seek to understand how ED is working to minimize the possibility of errors by servicers and ED itself, and ensure that borrowers are held harmless for any errors that do occur.

Actions by the Department of Education

We commend the Administration's swift actions to support borrowers as they now return to repayment following the Supreme Court's decision this summer.⁷ The Administration is instituting a 12-month "on-ramp" to repayment to "help borrowers avoid the harshest consequences of missed, partial, or late payments."⁸

We seek to understand how ED will ensure the full implementation of these on-ramp protections. In many cases, these protections require ED to override the default operation of the student debt collection machinery. When ED has sought to put in place similar protections in the past, bureaucratic complexities and insufficient oversight have led to implementation errors. For example, when the COVID-19 pandemic began, ED announced that it would stop garnishing the wages of borrowers who defaulted on their loans.⁹ Nevertheless, hundreds of thousands of borrowers had their wages erroneously garnished, even as payments, interest, and collections were paused.¹⁰ An Inspector General report later concluded that procedures were not developed to monitor the progress of suspending these involuntary collections and of refunding borrowers.¹¹

⁶ Federal Student Aid, "Repaying Student Loans for the First Time," <https://studentaid.gov/manage-loans/repayment/repaying-first-time>; NPR, "Exclusive: New Biden student loan plan unveiled amid agency funding crisis," Cory Turner, January 10, 2023, <https://www.npr.org/2023/01/10/1147758692/exclusive-new-biden-student-loan-plan-unveiled-amid-agency-funding-crisis>.

⁷ Immediately following the June 30, 2023 Supreme Court decision on President Biden's student loan debt relief plan, the Biden Administration announced the Saving on a Valuable Education (SAVE) plan, to make payments more affordable for low-income borrowers. Additionally, the Administration has worked to provide debt relief and cancellation to as many borrowers as possible, as quickly as possible. These efforts include 1) discharging the loans of borrowers defrauded by predatory institutions, 2) fixing administrative failures to approve loan forgiveness for long-term public servants and borrowers who have made over two decades of student loan payments, and 3) initiating rulemaking aimed at opening an alternative path to debt relief for as many borrowers as possible using the *Higher Education Act*. See U.S. Department of Education, "Secretary Cardona Statement on Supreme Court Ruling on Biden Administration's One Time Student Debt Relief Plan," press release, June 30, 2023, <https://www.ed.gov/news/press-releases/secretary-cardona-statement-supreme-court-ruling-biden-administrations-one-time-student-debt-relief-plan>; U.S. Department of Education, "Biden-Harris Administration Announces an Additional \$9 Billion in Student Debt Relief," press release, October 4, 2023, <https://www.ed.gov/news/press-releases/biden-harris-administration-announces-additional-9-billion-student-debt-relief>.

⁸ U.S. Department of Education, "Secretary Cardona Statement on Supreme Court Ruling on Biden Administration's One Time Student Debt Relief Plan," press release, June 30, 2023, <https://www.ed.gov/news/press-releases/secretary-cardona-statement-supreme-court-ruling-biden-administrations-one-time-student-debt-relief-plan>;

⁹ Washington Post, "Education Department to halt collection of defaulted student loans, refund \$1.8 billion," Danielle Douglas-Gabriel, March 24, 2020, <https://www.washingtonpost.com/education/2020/03/24/student-loans-collection-coronavirus/>.

¹⁰ Washington Post, "Wage garnishments for student loan debt continued despite payment pause, records show," Danielle Douglas-Gabriel, December 15, 2022, <https://www.washingtonpost.com/education/2022/12/15/student-loan-wage-garnishment-errors/>.

¹¹ U.S. Department of Education Office of Inspector General, "Federal Student Aid's Suspension of Involuntary Collection in Response to the Coronavirus Pandemic," June 15, 2021, <https://oig.ed.gov/reports/inspection-evaluation/federal-student-aids-suspension-involuntary-collection-response>.

For example, we are concerned that ED’s credit reporting processes may expose borrowers’ credit scores to unanticipated consequences. Leading up to the restart of student loan repayment, the Administration assured borrowers that, if they miss payments during the 12-month on-ramp period, they will not be “considered delinquent, reported to credit bureaus, placed in default, or referred to debt collection agencies.”¹² FSA’s website clarifies that, while it won’t report borrowers as delinquent, it “do[es] not control how credit scoring companies factor in missed or delayed payments.”¹³ Nevertheless, borrowers may interpret this “on-ramp” protection to mean that their credit scores will not be impacted by missed payments during this period. ED could align its practices with borrowers’ expectations by simply not reporting information about delinquent loans to credit bureaus during the on-ramp period and allow consumer reporting agencies to treat any missed payments as if they were regular scheduled payments made by borrowers (as was the case during the COVID-19 payment pause).¹⁴ The *Debt Collection Improvement Act* (DCIA) only requires ED to report *delinquent* student loans to credit bureaus,¹⁵ yet during the on-ramp period, ED is not regarding loans with missed payments as delinquent.¹⁶

We are also concerned that ED’s practice of *retroactively* placing loans with missed payments in forbearance will create unnecessary errors. During this on-ramp period, ED is automatically placing loans with missed payments in forbearance.¹⁷ However, as consistent with their debt reporting practices, ED is not doing so until 90 days after the missed payment.¹⁸ This retroactive approach could increase the risk of error as retroactivity can be confusing for borrowers, difficult to administer, and could be prone to errors.¹⁹ This retroactive approach could also unintentionally depress borrowers’ credit scores during those 90 days before the forbearance is applied if a servicer inaccurately reports a borrower’s information.²⁰ ED should explore whether placing accounts in forbearance on the 30th or 60th day after a missed payment — rather than the 90th day

¹² The White House, “FACT SHEET: President Biden Announces New Actions to Provide Debt Relief and Support for Student Loan Borrowers,” June 30, 2023, <https://www.whitehouse.gov/briefing-room/statements-releases/2023/06/30/fact-sheet-president-biden-announces-new-actions-to-provide-debt-relief-and-support-for-student-loan-borrowers/>.

¹³ Federal Student Aid, “Prepare for Student Loan Payments to Restart,” Questions and Answers, <https://studentaid.gov/manage-loans/repayment/prepare-payments-restart>.

¹⁴ The Coronavirus Aid, Relief, and Economic Security Act of 2023, Public Law 116-136, Sec. 3513; POLITICO, “Emergency relief screw-up hits 5 million student loan borrowers,” Michael Stratford, May 21, 2020, <https://www.politico.com/news/2020/05/20/emergency-relief-student-loan-272334>.

¹⁵ 31 U.S.C. § 3711(e).

¹⁶ Letter from Edfinancial Services to Senators Elizabeth Warren, Richard Blumenthal, Chris Van Hollen, and Edward J. Markey, October 11, 2023, p. 25, [On File with the Office of U.S. Senator Elizabeth Warren]

¹⁷ Federal Student Aid, “Prepare for Student Loan Payments To Restart,” Questions and Answers, <https://studentaid.gov/manage-loans/repayment/prepare-payments-restart>.

¹⁸ Federal Student Aid, “Student Loan Delinquency and Default,” <https://studentaid.gov/manage-loans/default>.

¹⁹ National Association of Student Financial Aid Administrators, “Closed School Discharges, Interest Capitalization, and PSLF: Neg Reg in Full Swing With Packed Day 2,” Owen Daugherty and Hugh T. Ferguson, November 3, 2021,

https://www.nasfaa.org/news-item/26332/Closed_School_Discharges_Interest_Capitalization_and_PSLF_Neg_Reg_in_Full_Swing_With_Packed_Day_2; Consumer Financial Protection Bureau, “Prepared Remarks of CFPB Director Richard Cordray at the Consumer Advisory Board Meeting,” Richard Cordray, June 8, 2017, <https://www.consumerfinance.gov/about-us/newsroom/prepared-remarks-cfpb-director-richard-cordray-consumer-advisory-board-meeting-june-2017/>.

²⁰ POLITICO, “Emergency relief screw-up hits 5 million student loan borrowers,” Michael Stratford, May 21, 2020, <https://www.politico.com/news/2020/05/20/emergency-relief-student-loan-272334>.

— could still accomplish its goals while minimizing the risk of administrative errors or adverse impacts on credit scores.

Actions by Student Loan Servicers

Student loan servicers are also a key source of other possible errors that could impact borrowers during return to repayment. Potential errors include charging borrowers more than they actually owe, improper claims of delinquency, improper handling of paperwork, incorrectly tracking a borrower's payment history, and mistakenly communicating when debts were forgiven.²¹ Traditionally, ED has worked to minimize servicer error and hold servicers accountable through the use of performance metrics, called the Service Level Agreement Metrics (SLA Metrics).²² Under the Biden Administration, ED strengthened those standards to improve the performance, transparency, and accountability of its servicers.²³ The metrics measured servicers' ability to meet threshold goals, such as: 70 percent borrower satisfaction with customer service; 95 percent casework accuracy; and a call abandonment rate no higher than 4 percent.²⁴

Recently, however, ED appears to have weakened those performance standards, at least for some servicers. For example, in April 2023, the Department modified its contract with the student loan servicer, Nelnet, to loosen Nelnet's SLA metrics.²⁵ As a result of this change, the maximum allowed call abandonment rate was doubled from no more than 4 percent, to 8 percent.²⁶ Further, the modified contract reduced the minimum number of customer service hours that Nelnet-owned servicers were required to provide.²⁷ Servicers have also reduced the hours their customer

²¹ The American Prospect, "Student Borrowers Report Chaos and Confusion as Repayment Looms," David Dayen, August 31, 2023, <https://prospect.org/education/2023-08-31-student-borrowers-report-chaos-repayment-looms/>; Pew Charitable Trusts, "Student Loan Borrowers Feel the Brunt of Mistakes Made in Tracking Repayment History," Regan Fitzgerald, Jon Remedios, and Brian Denten, April 6, 2022, <https://www.pewtrusts.org/en/research-and-analysis/articles/2022/04/06/student-loan-borrowers-feel-the-brunt-of-mistakes-made-in-tracking-repayment-history>; Consumer Financial Protection Bureau, "Student loan servicing," September 2015, pp. 50-55, https://files.consumerfinance.gov/f/201509_cfpb_student-loan-servicing-report.pdf;

²² U.S. Securities and Exchange Commission, "Amendment of Solicitation/Modification of Contract," Issued by United States Department of Education to Great Lakes Educational Loan Services, Inc., December 15, 2021, https://www.sec.gov/Archives/edgar/data/1258602/000125860221000070/exhibit10209d0012_mod001.htm.

²³ U.S. Department of Education, "U.S. Department of Education Increases Servicer Performance, Transparency, and Accountability Before Loan Payments Restart," press release, October 15, 2021, <https://www.ed.gov/news/press-releases/us-department-of-education-increases-servicer-performance-transparency-and-accountability-loan-payments-restart>.

²⁴ U.S. Securities and Exchange Commission, "Amendment of Solicitation/Modification of Contract," Issued by United States Department of Education to Great Lakes Educational Loan Services, Inc., December 15, 2021, p. 2, https://www.sec.gov/Archives/edgar/data/1258602/000125860221000070/exhibit10209d0012_mod001.htm.

²⁵ MarketWatch, "Student loan 'train wreck': As return of regular payments loom, servicers have less staff to field expected deluge of calls," Jillian Berman, April 9, 2023, <https://www.marketwatch.com/story/student-loan-train-wreck-as-return-of-regular-payments-loom-servicers-have-less-staff-to-field-expected-deluge-of-calls-8d62a380>.

²⁶ U.S. Securities and Exchange Commission, "Amendment of Solicitation/Modification of Contract," Issued by United States Department of Education to Great Lakes Educational Loan Services, Inc., December 15, 2021, p. 2, <https://www.sec.gov/Archives/edgar/data/1258602/000125860223000030/exhibit101nmodification.htm>.

²⁷ U.S. Securities and Exchange Commission, "Amendment of Solicitation/Modification of Contract," Issued by US Department of Education to Nelnet Servicing, LLC, April 1, 2023, p. 2, <https://www.sec.gov/Archives/edgar/data/1258602/000125860223000030/exhibit101nmodification.htm>.

service lines are open.²⁸ Such cuts disproportionately affect the most vulnerable borrowers, such as those who work multiple jobs and cannot call their servicer during office hours and do not have time to be on hold for hours with their servicer to learn about affordable repayment plans.

In addition, many servicers appear to be failing to meet existing standards.²⁹ For example, some borrowers are facing extraordinarily long wait times to reach servicers by phone.³⁰ Consumer Financial Protection Bureau (CFPB) director Rohit Chopra recently stated that “we’re seeing that many borrowers are struggling to even get through to their servicers.”³¹ A Marine Corps veteran shared his experience of repeatedly trying to contact his loan servicer, MOHELA, to inquire about the Public Service Loan Forgiveness (PSLF) program, but was told his estimated wait time was over 140 minutes.³² Another public servant reported that it is “virtually impossible” to reach her servicer to resolve a time-sensitive issue that, ³³ if not resolved by the end of 2023, would make her ineligible for PSLF.³⁴ According to an NPR report, federal data show “multiple servicers have had call wait times so long that more than half of borrowers gave up before getting through on the phone.”³⁵ Last month, the CFPB published a report based on approximately 9,284 student loan consumer complaints submitted between September 1, 2022, and August 31, 2023.³⁶ The report found that servicers are failing to provide accessible customer service, are making errors in loan administration, and are hindering borrowers’ access to loan cancellation programs.³⁷ Additionally, we are alarmed that more than 400,000 borrowers discovered their monthly student loan payments had been miscalculated, often for higher amounts than they owed, as payments resumed.³⁸

²⁸ CNN, “Student loan servicers cut customer service hours ahead of payment restart,” Katie Lobosco, April 30, 2023, <https://www.cnn.com/2023/04/30/politics/student-loan-servicer-payment-restart/index.html>.

²⁹ On March 22, 2023, the Department of Education issued a bilateral modification outlining changes to servicing requirements and contract pricing. These requirements include a maximum call abandonment rate of 8 percent, a minimum customer satisfaction threshold of 70 percent, and a timeliness minimum threshold of 95 percent. *See* U.S. Securities and Exchange Commission, “Amendment of Solicitation/Modification of Contract,” Issued by US Department of Education to Nelnet Servicing, LLC, April 1, 2023, p. 2, <https://www.sec.gov/Archives/edgar/data/1258602/000125860223000030/exhibit101nmodificatio.htm>; NPR, “Student loan borrowers are spending a lot of time on hold, says federal watchdog,” Cory Turner, September 11, 2023, <https://www.npr.org/2023/09/11/1198760888/student-loan-borrowers-are-spending-a-lot-of-time-on-hold-says-federal-watchdog>.

³⁰ Business Insider, “Hours-long hold times with their student-loan company are keeping public servants in a 'limbo period' wondering if they'll get the debt relief they qualify for,” Ayelet Sheffey, October 22, 2022, <https://www.businessinsider.com/student-loan-borrowers-cant-reach-company-mohela-pslf-debt-relief-2022-10>.

³¹ NPR, “Student loan borrowers are spending a lot of time on hold, says federal watchdog,” Cory Turner, September 11, 2023, <https://www.npr.org/2023/09/11/1198760888/student-loan-borrowers-are-spending-a-lot-of-time-on-hold-says-federal-watchdog>.

³² Business Insider, “Hours-long hold times with their student-loan company are keeping public servants in a 'limbo period' wondering if they'll get the debt relief they qualify for,” Ayelet Sheffey, October 22, 2022, <https://www.businessinsider.com/student-loan-borrowers-cant-reach-company-mohela-pslf-debt-relief-2022-10>.

³³ *Id.*

³⁴ Federal Student Aid, “The Limited PSLF Waiver Opportunity Ended on Oct. 31, 2022,” <https://studentaid.gov/announcements-events/pslf-limited-waiver>.

³⁵ NPR, “Federal student loan borrowers prepare to resume repaying their loans,” Michel Martin and Cory Turner, September 18, 2023, <https://www.npr.org/transcripts/1200076867>.

³⁶ Consumer Financial Protection Bureau, “Report of the CFPB Education Loan Ombudsman,” October 2023, p.2, https://files.consumerfinance.gov/f/documents/cfpb_annual-education-loan-ombudsman-report_2023.pdf.

³⁷ *Id.*, pp. 8-16.

We recognize that student loan servicers are facing an unprecedented challenge in serving millions of borrowers as they return to repayment. But the Department must hold servicers accountable for any services they fail to provide — and ensure that borrowers are not personally harmed by servicer errors.

We applaud ED’s recent announcement of new strategies for holding servicers accountable, including through direct monitoring, partnering with consumer protection regulators, and tracking borrower complaints.³⁹ We also commend ED’s decision to ramp up enforcement of servicers’ obligations, including through the recent withholding of \$7.2 million to MOHELA for its egregious “failure to send timely billing statements to 2.5 million borrowers.”⁴⁰ Indeed, MOHELA’s blunder underscores the urgent need for stricter oversight. We urge the Department to rigorously implement this new framework for oversight and accountability. Furthermore, ED must safeguard borrowers from the consequences of servicer errors, such as by continuing to apply no-interest administrative forbearances to loans plagued with servicer errors automatically, and counting any months borrowers spend in administrative forbearance towards loan forgiveness programs.

The chaotic resumption of federal student loan payments has raised questions about the extent of errors and the measures being taken by the Department to address these concerns and provide assistance to affected borrowers. Therefore, we request the Department provide the following no later than December 15, 2023:

1. An audit of the number of borrowers who missed their October 2023 student loan payment, categorized by loan servicer, and a thorough examination of student loan servicer errors encountered during the initial month of repayment resumption, along with the corrective measures implemented to address these issues;
2. A comprehensive overview of administrative forbearances, including the number of borrowers granted administrative forbearance, whether interest was waived, whether such forbearances were counted towards loan forgiveness programs, and the measures taken to prevent and address the consequences of implementation errors; and
3. Details regarding auto-payments and overdraft protection measures implemented to prevent borrowers from incurring penalties due to servicer errors and the process for issuing refunds for borrowers who overpay.

Further, to better understand ED’s implementation of return to repayment and oversight of student loan servicers, we request answers to the following questions no later than December 15, 2023:

³⁸ The Washington Post, “Rollout of Biden’s new student loan repayment plan hits early snags,” Danielle Douglas-Gabriel, October 7, 2023, <https://www.washingtonpost.com/education/2023/10/07/save-student-loan-payment-errors/>.

³⁹ U.S. Department of Education, “Biden-Harris Administration Announces Framework for Student Loan Servicer Accountability To Protect Borrowers Nationwide,” press release, November 9, 2023, <https://content.govdelivery.com/accounts/USED/bulletins/37a264c>.

⁴⁰ *Id.*


1. Describe the key changes in servicer standards from the October 2021 student loan servicer contracts to the most recent modification of servicer contracts with the Department of Education.
2. Describe the guidance the Department provided to student loan servicers regarding call center hours and SLA metrics ahead of return to repayment.
3. Describe the rationale for modifying the SLA Metrics that were established in the October 2021 servicer contracts.
4. Describe the rationale for modifying the contact center requirements that were established in the October 2021 servicer contracts.
5. Describe the outreach ED has conducted for the 8.5 million borrowers with Federal Family Education Loans (FFEL)⁴¹ about the benefits and risks of loan consolidation, including the December 31, 2023, deadline for the IDR Account Adjustment.⁴²
4. What is the current SLA metric regarding customer satisfaction that governs Edfinancial, MOHELA, Aidvantage, Nelnet?
 - a. What are the customer service rate outcomes for Q1-Q3 of 2023 for Edfinancial, MOHELA, Aidvantage, Nelnet?
5. What is the current SLA metric regarding abandonment rate that governs Edfinancial, MOHELA, Aidvantage, Nelnet?
 - a. What are the abandonment rate outcomes for Q1-Q3 of 2023 for Edfinancial, MOHELA, Aidvantage, Nelnet?
6. What is the current SLA metric regarding interaction quality monitoring that governs Edfinancial, MOHELA, Aidvantage, Nelnet?
 - a. What are the interaction quality monitoring outcomes for Q1-Q3 of 2023 for Edfinancial, MOHELA, Aidvantage, Nelnet?
7. What is the current SLA metric regarding accuracy rates that governs Edfinancial, MOHELA, Aidvantage, Nelnet?
 - a. What are the accuracy rate outcomes for Q1-Q3 of 2023 for Edfinancial, MOHELA, Aidvantage, Nelnet?
8. What tools does the Department have to hold servicers accountable in the event that they fail to meet SLA metrics or other key contract provisions? Will the Department commit to using this full suite of tools to address problems identified in the return to repayment?
9. Describe how the Department plans to hold borrowers harmless in the event of an administrative error by a student loan servicer.

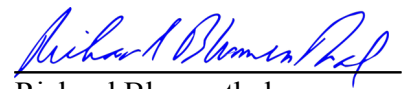
⁴¹ Federal Student Aid, “Federal Student Loan Portfolio,” <https://studentaid.gov/data-center/student/portfolio>.


⁴² Federal Student Aid, “Payment Count Adjustments Toward Income-Driven Repayment and Public Service Loan Forgiveness Programs,” Frequently Asked Questions, Footnotes 13 and 17, <https://studentaid.gov/announcements-events/idr-account-adjustment>.


10. Describe how the Department plans to hold borrowers harmless in the event that they cannot reach their student loan servicer call center to access information about their options during return to repayment?
11. Clarify how the Department will apply forbearances to borrowers who miss a student loan payment during the "on-ramp" period, and whether loan servicers will be directed to apply forbearances retroactively.
12. Describe how the Department expects borrowers' credit scores will be affected during the "on-ramp" period if they do not make a monthly payment, given ED's planned approach to applying forbearance.
13. How will ED's plan for retroactive application of forbearances ensure that this forbearance system is administered in a way least likely to affect credit scores?
14. Has ED considered not furnishing student loans during the "on-ramp" period in order to prevent borrowers from facing unnecessary harm to their credit scores?
15. What is ED's rationale for waiting 90 days before retroactively placing a loan with missed payments in forbearance?

Sincerely,


Elizabeth Warren
United States Senator


Richard Blumenthal
United States Senator


Bernard Sanders
United States Senator


Chris Van Hollen
United States Senator