***TASFAA ***

 $\star 2024 \star$

Federal Student Loan Program What's In Store for 2024?

TORI WATSON, EDAMERICA

What's In Store for 2024

- Return to Repayment
- ► New Repayment Plans
- ▶ Federal "On Ramp"
- Delinquency and Default
- ► Take Action



Changes in Servicers

Since 2020

- Servicers have consolidated brands, transferred loans to a new entity or exited the program
- Over 16M borrowers have seen their servicer change
- Three of the remaining four servicers are also BPOs*

Federal Loan Servicers

<u>2020</u>

Granite State FedLoan Servicing (PSLF) Navient Nelnet Great Lakes OSLA MOHELA Edfinancial

2023/24 (As of 03/01/23)

AidVantage* Nelnet (w/Great Lakes) MOHELA (PSLF)* Edfinancial* Central Research (2024)

Factors Impacting R2R

Customer Service Capacity

- Intense activity over an abbreviated period
- More borrowers with more questions
- ► Fewer loan servicers

NSLDS Database and Reporting

- Enrollment updates
- Other related issues

12 Month On Ramp/Sept 1, 2023

- NSLDS shows early-stage delinquency
- Borrower placed in Forb at 90 days
- Delinquencies not reporting to credit agencies

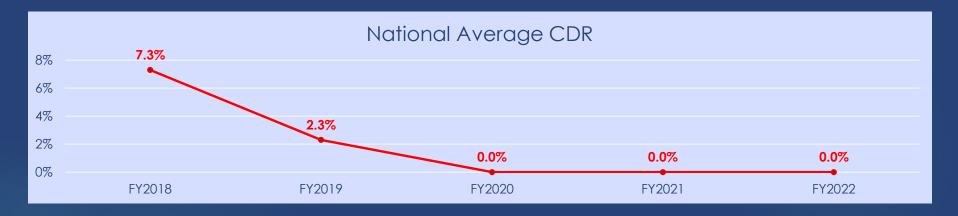
Student Perceptions

- Impact of forgiveness or lack thereof
- Expectation of future forgiveness
- What are your students saying?

Federal Budget

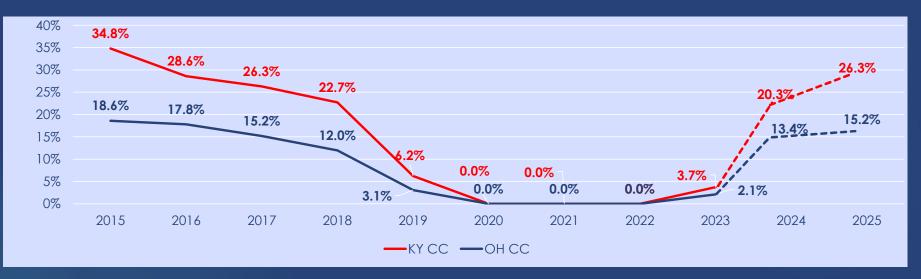
- ► FSA was flat funded
- Limited capacity to fund extra support initiatives
- Servicers capabilities not the same as "pre-Covid"

Cohort Default Rates



- Students have forgotten how to repay
- Institutional budgets may have been redirected
- Risk level is unknown but not absent

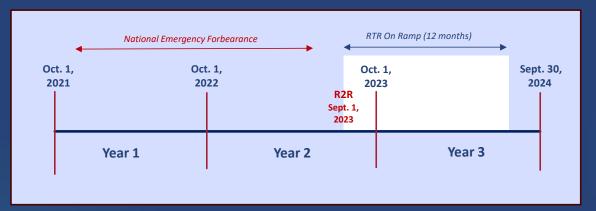
What's Past is Prologue



The last "normal" cohort was FY 2017

- ▶ FY 2020, FY 2021 and FY 2022 will all report at or near 0% CDR's
- ▶ FY 2023, FY 2024 will see increasing defaults
- FY 2025 will be the first cohort that will be unaffected by the national forbearance and the RTR on ramp

Cohort Cycle for FY 2022



Impact to School

- National Forbearance for 23 months of FY 2022 Cohort Calculation period
- Return to Repayment Sept 1, 2023
- The 12 month "on ramp" period means that no students can become more than 90 days delinquent– no defaults
- ▶ FY 2022 cohort closes on Sept 30, 2024

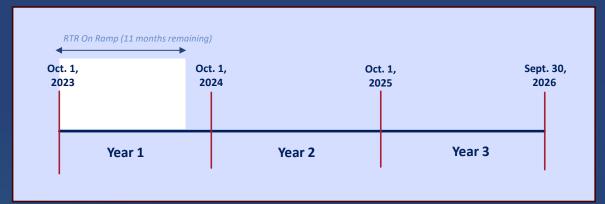
Cohort Cycle for FY 2023



Impact to School

- 13 months remain in the cohort calculation after end of "on ramp"
- Federal student loans default at 360 days delinquent
- Expect FY 2023 to have some defaults
- Recommend closely monitoring delinquency trends beginning Oct 1, 2024

Cohort Cycle for FY 2024



Impact to School

- ▶ FY 2024 will have an increasing number of defaults
- 25 months remaining in the cohort calculation
- Recommendation
 - Closely monitor delinquency trends beginning Oct 1, 2024
 - Consider implementation of Grace Counseling
 - Consider implementation of Delinquency outreach beginning Oct/Nov 2024

The Second Coming of R2R

- Borrowers are utilizing the on-ramp vs. choosing to make payments.
- Roughly 40% of the FY 2023 cohort in "delinquency" status.
- Especially impactful for FY 2024 cohort as many of these borrowers are still a "grace" status.
- Reminder, FY 2025 will be the first cohort since FY 2017 that will not be impacted by the National Forbearance.

Date	Cohort	Borrowers in Repayment	Delinquency Rate
January 2020	FY 2019	670	24.18
January 2024	FY 2024	472	34.32

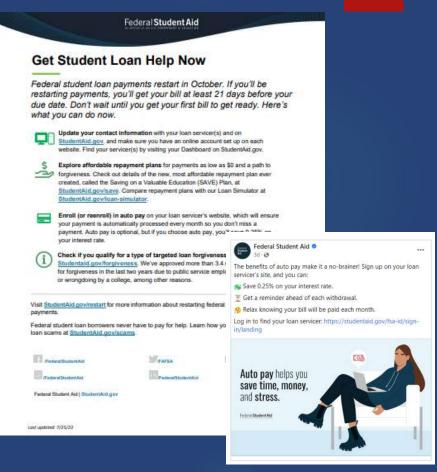
Get Ahead of the Curve

- Closely monitor FY 2023
- Focus intervention on FY 2024 and 2025 cohorts
- CDRs and other accountability metrics are a lagging indicators
- Monitor delinquency trends

Cohorts	Begin Monitoring	Monitoring Ends	Draft Rates Released to Colleges	Official Rates Published
2020	Oct. 1, 2019	Sept. 30, 2022	Feb. 2023	Sept. 2023
2021	Oct. 1, 2020	Sept. 30, 2023	Feb. 2024	Sept. 2024
2022	Oct. 1, 2021	Sept. 30, 2024	Feb. 2025	Sept. 2025
2023	Oct. 1, 2022	Sept. 30, 2025	Feb. 2026	Sept. 2026
2024	Oct. 1, 2023	Sept. 30, 2026	Feb. 2027	Sept. 2027
2025	Oct. 1, 2024	Sept. 30, 2027	Feb. 2028	Sept. 2028

What Can you Do?

- Need to create or dust off default prevention plans
- Utilize FSA Tool Kit
 - Need to make R2R "top of the mind" with borrowers
 - Social media, flyers, student union messaging, student portal reminders, etc.
- Use NASFAA Task Force Report as Guide
 - Servicers may not provide "enhanced outreach"
 - Work with various offices on campus (admissions, alumni office, work study, student services, etc.) to help with communication to borrowers
- Collaboration with specialty partners



Sample Video – FSA Took Kit

Loan Simulator can help you find a student loan repayment plan that meets your needs and goals.



What can you Do? (continued)

- Keep administration informed and ahead of program changes
 - Financial Value Transparency (FVT) for all students and families
 - Detailed information about out-of-pocket expenses for programs and possible debt
 - Earning potential upon graduation
 - Enhanced transparency for programs through new reporting requirements for institutions related to costs (tuition, fees, books, and supplies), non-federal grant aid, and typical borrowing amounts (for both private and federal loans)

Thank you!

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