

Grebeldinger, Beth

From: Foss, Ian
Sent: Thursday, June 25, 2015 9:42 AM
To: 'Vicki Shipley'
Subject: Long-Awaited Revisions to Deferment/Forbearance Forms
Attachments: UNEM_Draft_v3.docx; EDU_Draft_v3.docx; HRD_Draft_v3.docx; PLUS_Draft_v3.docx; PLWM_Draft_v3.docx; PUB_Draft_v3.docx; SCH_Draft_v3.docx; TDIS_Draft_v3.docx; ~~SLDB_Draft_v3.docx; SERV_Draft_v3.docx~~

Hi Vicki,

It took me quite a while to run through your comments. They were extensive, and rightfully so, as this was a large restructuring of the forms. Attached are clean copies of the forms as they will enter the 30-day comment period. I'm sending them in advance so that you all have a while to look at them. Basically, I accepted your overarching comment to not include skip logic in the authorized official sections, but am not willing to remove skip logic in the borrower section or to add skip logic concerning the date-based limitations of some of the deferments. I did add some cautionary language in the borrower sections, where appropriate, to call out that there is a date limit, and I hope that addresses the spirit of your concerns.

Now, for one more thing. We need to add the Perkins Loan Program to these forms. I don't know how I didn't realize it until now, but the deferments are basically the same between the FFEL, DL, *and* Perkins Loan Programs, and there should be combined forms. As a result of adding Perkins, you'll notice some of the legal boilerplate (about administrative forbearances in particular) and some of the definitions have changed (and become simpler). Before you all dive too deeply into the forms, I think it would be a good idea to get a conference call together with you all, SLSA, our servicers, COHEAO, and ECSI, to discuss these forms so that we can chat about the direction we're headed and get some preliminary feedback from you all. Let me know when would be good for you and those in your shop. I'm also happy for anyone who you want to attend in DC to come to FSA.

Lastly, by way of sign off, you should be getting the revised IDR form quite soon. So, be sure to keep an eye out for it. I'll be sure to send it to you when it's time.

Ian

The above attachments are all included in the file titled 1845-0011 Data Part 2 30 day filing.