

**These are the formal responses to the 2 comments received during the 30 day comment period for the Docket Number ED-2015-ICCD-0138**

**Document:** ED-2015-ICCD-0138-0034

Comment on FR Doc # 2016-03057

**Submitter Information**

**Name:** Anonymous Anonymous

**General Comment**

School are required to report private loan and payment plans to the department. However, there is nothing in regulations that give a school direction if the student does not want this information report to the Department of Education. These students do not feel their information should not be reported since they are not receiving government assistance. How does a student Opt-out if they don't want the school to report this information to the department.

**FSA Response:**

This comment does not appear to be related to the Enterprise Complaint System.

**Document:** ED-2015-ICCD-0138-0036

Comment on FR Doc # 2016-03057

**Submitter Information**

**Name:** Winfield Crigler

**Submitter's Representative:** Winfield Crigler

**Organization:** Student Loan Servicing Alliance (SLSA)

**General Comment**

Attached are additional comments from the Student Loan Servicing Alliance (SLSA). We also filed comments on February 8, 2016 in response to the original Federal Register notice.

See attached document for full comment

**FSA Response:**

We are working with the CFPB to minimize duplication of effort regarding the collection of complaint information related to federal student loans.

**Additionally FSA is respectfully requesting an abbreviated OMB final review.**

Since its announcement in the President's Student Aid Bill of Rights, FSA has known that the Presidential mandate to implement a feedback system by July 1<sup>st</sup>, 2016, would require an aggressive development schedule. However, given the valuable service that this system will provide to customers of Title IV student aid programs, we agree that setting such a timeline has been the right approach. In order to remain on target, we must implement partial functionality by April 8, 2016, a step that will allow us to refine our business processes to ensure that customers receive timely and satisfactory resolutions. To meet our deadline of April 8<sup>th</sup>, we are requesting that OMB complete its review by Monday, April 4<sup>th</sup>. Thank you for your assistance in this matter.



March 17, 2016

Director of the Information Collection Clearance Division  
U.S. Department of Education,  
400 Maryland Avenue S.W.  
LBJ, Room 2E103  
Washington, DC 20202-4537

RE: Docket ID No: ED-2015-ICCD-0138  
Enterprise Complaint System

Dear sir or madam:

The Student Loan Servicing Alliance (SLSA) SLSA is a non-profit trade association made up of approximately 25 major student loan servicers whose members service both federal student loans and private education loans. Student loan service providers are responsible for a range of services, including the processing of loan applications, communications with consumers, the provision of disclosures and billings, the processing of payments, and the collection of payments.

SLSA submitted comments on February 8, 2016 in connection with the proposed design and implementation of the Enterprise Complaint System (Docket No: ED-2015-ICCD-0138). At the time we submitted our original comments, the Consumer Financial Protection Bureau (CFPB or Bureau) had not yet announced that it was beginning to accept complaints on federal student loans through its complaint portal. Given the Bureau's announcement, we are providing a supplemental response to our earlier submission.

We have concerns with there being two portals for federal loan customers to request assistance or submit a complaint. Fundamentally, this approach will cause borrower confusion. The two systems will have different timelines and different processes for dealing with complaints. We want to be responsive to borrowers and to timely resolve their questions or concerns; we do not want to insert additional confusion into the already complex process of student loan repayment. We recommend a simplified process that would direct all initial complaints for federal loans to the Enterprise Complaint System (ECS), including any complaints received through the CFPB. A customer that submits a follow-up complaint within a prescribed timeframe through the CFPB portal after the initial complaint in the ECS has been closed, would be responded to in the CFPB pathway.

We are also concerned about the ability to track complaints across the two systems and to avoid duplicate reporting of complaints and complaint resolutions. A joint numbering system adopted by both the CFPB and FSA would help to resolve this issue. Without a joint numbering system, it will be very difficult to track complaints and their timely resolution across the two systems and ensure coordinated responses to consumers.

Finally, monitoring and responding to complaints in two different systems (in addition to our own internal complaint processes) will take time and effort away from other areas of loan servicing. We appreciate the importance of borrower complaints in pointing out areas of opportunity or potential customer confusion, but we fear that these multiple systems will unnecessarily increase the complexity of monitoring complaints, developing meaningful understandings of issues and trends, and the workload to track and respond to duplicate complaints.

Thank you for the opportunity to comment on this information collection. If you have questions about our comment, please contact the undersigned.

Sincerely,



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