
Subject: Requested 7037 - Q&A Discussion for Servicers on Fiserv Platform
Location: Microsoft Teams Meeting

Start: Fri 8/9/2024 11:00 AM
End: Fri 8/9/2024 11:30 AM
Show Time As: Tentative

Recurrence: (none)

Organizer: USDSCORTEAM

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Subject: Per Edfinancial's request, FSA will meet with Fiserv and other servicers on the Fiserv servicing system platform to discuss the Q&A responses for CR 7037. Please forward to proper attendees as needed.

- 1) For question 85: We understand that the earliest date for M2 is 6/1/2024 and earliest date for M3 is 12/31/2023 but still unclear if there is a specific set of dates that will be used or if the effective date can be **any date** within that range.
- 2) For question 86, no additional clarifications needed only included because it relates to Q85 as we need to build a process to refund payments from effective date to conversion date.
- 3) Based upon Q&A item #86, Fiserv will most likely need payment data from Compass on converted loans
- 4) For question 64, Fiserv believes the 'Revised Outstanding Balance' value for the letter should be as of the **posting** date of the discharge not the **effective** date. Post date would be 'current' state and in alignment with what the customer would see on the web once the discharge process is complete.
For example: Posting a discharge on 10/10/2024 with an effective date of 09/01/2024

- Before discharge posting:



Current balance as of 10/10/2024 before discharge posting = 4539.72 + 17.40 = 4557.12 (Balance Before Forgiveness)

date	activity	prin balance as of this date	int balance
9/1/2024		\$ 5,000.00	\$ 30.00
9/15/2024	accrual		\$ 9.72
9/15/2024	new balance after accrual	\$ 5,000.00	\$ 39.72
9/15/2024	payment for -\$500	\$ 4,539.72	\$0
10/10/2024	accrual	\$ 4,539.72	\$17.40

- After discharge posting:

Current balance as of 10/10/2024 after discharge posting = 3538.65 + 8.68 = 3547.33 (Revised Outstanding Balance)

date	activity	prin balance as of this date	int balance
9/1/2024		\$ 5,000.00	\$ 30.00
9/1/2024	203 transaction for \$1000	\$ 4,030.00	\$ -
9/15/2024	accrual		\$ 8.65
9/15/2024	new balance after accrual	\$ 4,030.00	\$ 8.65
9/15/2024	payment for -\$500	\$ 3,538.65	\$0
10/10/2024	accrual	\$ 3,538.65	\$8.68

- Letter would read:

This partial forgiveness is effective as of 9/1/2024.....

Loan Program	Disbursement Date	Balance Before Forgiveness	Amount Forgiven	Revised Outstanding Balance
xyz	date	\$4557.12	\$1000.00	\$3547.33

Question #	Date Received from Servicer	Requirement Number	Question	FSA Response
85	8/2/2024	M2/3 File	How is the effective date determined for M2&3? is it loan specific or will there be a defined set of dates for each measure.	<i>The effective date for each loan will be included in the 01 Detail record in the Forgiveness Date</i>
86	8/2/2024	M2/3 File	Does Fiserv need to be made aware of payments made between the discharge effective date and conversion date in order to refund those payments to the customer or will the discharge amount provided by FSA in the D2D file represent the balance as of the discharge effective date?	<i>Yes, FISERV will need to be aware of payments. FSA is not providing the discharge amount for M2 and M3 loans.</i>
87	8/2/2024	M2/3 File	Can FSA confirm which field(s) will be providing the forgiveness amount for Measures 2 & 3. Should we be using the Forgiveness Amount field in the 02 record for the SDR discharge amount? Or should we be looking at the 01 record and using the Principal and Interest fields?	<i>See response to question 84. The 01 Record Principal and Interest fields are the P&I at the time the file was generated, not necessarily the borrower's current balance amounts.</i>
84	8/2/2024	M2/3 File	<p>Previous responses</p> <p>Confirm which field(s) FSA will be providing the forgiveness amount for Measures 2 and 3? Should we be using the Forgiveness Amount field in the 02 record of the SDR discharge amount?</p>	<i>No, FSA will not provide the forgiveness amount for M2 and M3. If a loan is in the M2 and M3 file it is full forgiveness. The Forgiveness Amount Field in the 02 record is the historical amount of forgiveness reported on the loan.</i>
81	7/30/2024	TPs	Can FSA confirm that borrowers with Commercially Held FFEL loans are truly eligible for Student Debt Relief? If so, how are these requirements being communicated to Lenders, Servicers and Guarantors?	<i>The opt-out and requirements within CR7037 do not apply to commercially held FFEL loans. The proposed regulations, if implemented, do contain debt relief provisions for FFEL borrowers. FSA plans to issue opt-out related guidance to commercial FFEL holders.</i>
82	7/30/2024	TPs	Is there an expectation that when servicers receive the reports, they should be updating any borrowers to an opt-out status based on what had been submitted to other servicers? For example, if a borrower has loans on both Servicer A and Servicer B, and they opted out at Servicer A, but not Servicer B, is Servicer B supposed to move the borrower's status to Opt-Out after receiving the report?	<i>FSA will send the consolidated opt-out listing to all servicers upon the completion of the opt-out period. Servicers are expected to update the status of any borrower on their system who may have opted out at one servicer but not another.</i>
83	7/30/2024	IST	Multiple	<i>We will provide more detail as soon as we can, but IST is only for the discharge and response files. IST will begin on 8/16. IST will not include the file that was going to be sent on 9/1. That is no longer required. Servicers should send their IST POC to FSA NLT 8/2.</i>
70	7/26/2024	Opt Out TPs	When we update the website banner are we to remove the current banner alert for the FSA message in regards to the July 18 th SAVE Administrative Stay Order?	<i>No, the servicer shall support multiple banners and IVR messages.</i>
71	7/26/2024	Opt Out TPs	Can FSA send us a list of the borrowers who will receive the e-mails on the potential forgiveness and opting out or are these being sent to all borrowers?	<i>Per the communication sent to servicers on 7/15 the notification is going to all borrowers.</i>
72	7/26/2024	Opt Out TPs	For #4 - Borrowers who enrolled in low-financial value programs , is this pertaining to BDD and does the opt-out pertain to BDD?	<i>No, this regulation does not pertain to BDD.</i>
73	7/26/2024	Opt Out TPs	If we are to receive an opt-out related to any of the 4 types of relief, do we need to stop processing any BDD or Automatic Closed School discharges?	<i>No - the opt-out will not apply to current BDD or automatic closed school discharges.</i>
74	7/26/2024	Opt Out TPs	When would we expect the proposed rules to be finalized?	<i>FSA anticipates the final rules will be published in the fall prior to the beginning of discharge processing.</i>
75	7/26/2024	Opt Out TPs	When would the Joint Consolidation Loan Separation Process become available to the borrowers?	<i>FSA has not finalized the Joint Consolidation Loan Separation Process timeline at this time. Once finalized servicers will receive additional guidance. Borrowers with JCL related questions should be directed to the link below for additional information. https://studentaid.gov/announcements-events/joint-consolidation-loans</i>
76	7/26/2024	Opt Out TPs	When we are updating NSLDS with the opt out are we to manually update NSLDS with the IDR opt-out or will there be a new opt-out for Debt Relief?	<i>The servicer should use the IDR opt-out. A new Debt Relief opt-out will not be created. Servicers should also submit opt-outs via the SDR Operational Reporting as described on tabs Opt Out Reporting Summary and Opt Out Reporting Detailed.</i>
77	7/26/2024	Opt Out TPs	Can we use the talking points and the information in the attached document to craft an email response to borrowers should they contact us with questions? Does FSA need to review/approve that email response?	<i>FSA is reviewing this request and will provide an update.</i>
78	7/26/2024	Opt Out TPs	Will FSA be creating a web page on SA.gov with the information in the attachment, or will it be added to StudentAid.gov/debtrelief?	<i>FSA will update StudentAid.gov/DebtRelief with additional information to correspond with the opt-out email campaign.</i>

79	7/29/2024	43000.07	For non-IDR borrower it states to redisclose borrower in a manner that impacts the next billing cycle. We assume this means that the payment amount is decreasing and will only be redisclosed if it decreases. Can FSA confirm?	<i>Yes, that is the intent</i>
80	7/29/2024	43000.07	For graduation and extended graduation: if they have more eligible term available then originally disclosed, should the new lower payment amount use the term remaining? For example: the borrower was disclosed most recently with a term of 60 instead of 120. When the Borrower Defense or Loan Forgiveness payments are applied, should the payment decrease using the full 120 term or continue using the 60 term? If using the 120 term, there is a chance the borrower could result in interest-only payments for the first tier of payments.	<i>Use the 60 term so the borrower gets the benefit of the lower payment, but not an extended payment period.</i>
63	7/1/2024	Letter	The letter requirements for Measure 1, 2, and 3 are inconsistent. Is FSA's expectation to have the discharge and letters sent within the expected 10 day turn times, or is the discharge to be completed within the SLA and the letter needs to be sent within 5 days of the forgiveness being discharged. For example, if the processing is completed on day 10, does the letter need to be sent on day 10 or does each servicer have 5 more days to send the borrower communication? Measure 1: •43000.060: The servicer shall notify each Measure 1 borrower once forgiveness has been applied. Measure 2: •43001.040: The servicers shall notify each Measure 2 borrower no later than 5 days after forgiveness has been applied. Measure 3: •43002.080: The servicers shall notify each Measure 3 borrower once forgiveness has been applied. •43002.060: Servicers shall complete all Measure 3 forgiveness processing, to include sending borrower notifications, within 10	<i>The expectation/SLO is the discharge will be applied as soon as possible, but not outside 10 business days. As it relates to the letter, the SLO is 5 business days. The SLOs for discharge application and the sending of the discharge notice are separate and distinct.</i>
64	7/1/2024	Letter	The Measure 1 letter includes the "Revised Outstanding Balance" as part of the letter. Should this balance be provided as of the post date of the letter or the effective date of the loan forgiveness (9/1/24).	<i>The effective date of the loan forgiveness.</i>
65	7/1/2024		At this time, does FSA have any more information about the cadence in which each file will be sent to the servicers for each measure?	<i>FSA anticipates sending the first measure 1, 2, and 3 together once all servicers are prepared to implement. The second round of measure 1, 2, and 3 files is not yet determined, but is unlikely to occur until the first round of files are complete and all response files received.</i>
66	7/1/2024		Is it possible that the same award ID could be received multiple times for Measure 1 across different files? Will FSA have a control for this? How should servicers respond/process if multiples are sent?	<i>No - FSA will review and analyze response files prior to sending the second measure 1 file at a date to be determined.</i>
67	7/1/2024		If a loan is skipped for SDR discharges due to another pending discharge and then the pending discharge is cancelled, how will the borrower receive their forgiveness benefit? Will FSA monitor this or do servicers need to create a tracking mechanism for this? Example - Borrower qualifies for TPD discharge and later opts out of the discharge. Do servicers need to monitor for this to apply the SDR discharge?	<i>In the example provided the borrower would be picked up in a subsequent run of the measure.</i>
68	7/1/2024		What is the SAIG Mailbox/Message class for the Measure 1, 2, 3 files?	<i>This information will be provided in a follow-up email to all servicers.</i>
69	7/1/2024	43001.030	Should the SDR not be applied if the borrower has applied for a consolidation (servicer has received a borrower inquiry) or when the servicer has received the payoff from the consolidation originator? If from the point of inquiry, is there a time frame to keep this exclusion in place?	<i>When the Servicer receives the borrower inquiry.</i>

60	6/3/2024	43010.010	<p>1. Based on the requirements above, can the borrower request to reverse the discharge after it has been applied if they don't qualify for a different type of discharge?</p> <p>2. How would servicers handle a BD, ACS, TPD approval that is received outside of the 6 month period where the borrower is not applying for another type of discharge?</p> <p>3. If Nelnet receives an approval on this type discharge that has an SDR and payments, would Nelnet reverse the SDR to the other discharge type even if it is outside of the 60 day window?</p> <p>SDR Discharge applied by servicer on 09/2/24, effective 9/1/24 Borrower makes payments to pay loan in full between 9/1/24-08/31/24. January 2025 – A Group Borrower Defense Approved Discharge. Servicers would reverse the SDR discharge since received within the 6 months and process Group Borrower Defense Approved Discharge.</p> <p>SDR Discharge applied on 09/2/24, effective 9/1/24 Borrower makes payments to pay loan in full</p>	<p>1. No, a borrower cannot request a discharge. See response to #59.</p> <p>2. After the 6 month period - unless ordered by a court - the SDR discharge shall remain and not be reversed.</p> <p>3. Please clarify the question.</p> <p>Scenario 1 - Correct. The SDR discharge would be reversed and BD applied.</p> <p>Scenario 2 - The SDR is not reversed, unless there is a court order.</p>
61	6/3/2024	43010.020	<p>Nelnet Assumption – If the SDR Measure 1 discharge is effective before the subsequent discharge, Nelnet will apply the subsequent discharge for the amount that brings the balance to \$0.00. If the SDR Measure 1 discharge is effective after the receipt of another discharge type, Nelnet will adjust the SDR Measure 1 write off to bring the loan balance to \$0.00.</p>	Correct.
58	6/3/2024	43010	<p>*Forgiveness Not Applied, Loan pending discharge or forgiveness. And 43010.000 The servicer shall not process the SDR forgiveness (Measures 1, 2, or 3) on the loan if any of the following discharges/forgiveness are actively pending on the loan: oAssumption – Pending discharge indicates it is an approved discharge or forgiveness.</p>	Correct
59	6/3/2024	43010	<p>*43010 series – How does a borrower need to request reversal? Ex. Verbal, Mail etc.</p>	The borrower cannot request (verbal or written) that the SDR discharge be reversed. To clarify, FSA intended the term "request" to mean that the borrower submitted an application, or was deemed eligible by FSA, for a discharge/forgiveness program listed in 43010 and was approved by FSA within the 6 month period.
43	5/10/2024	43001.041	<p>Related to Question #16: It is the concern of all payments being reapplied before the letter is generated to make sure the balance is accurate. So it creates a dependency and delays the letter. Payments get backed off and</p>	Can you please clarify your question?
51	5/14/2024		<p>Can FSA provide clarity on what is meant by 'Unlimited' - D2 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited</p>	Borrowers who make less than the income thresholds defined within the draft regulation are eligible for an unlimited amount of forgiveness to reduce the current principal and interest balance to the amount at which the borrower entered repayment. Those borrowers who are above the income threshold defined within the regulation or if FSA does not have income information available are eligible for up to \$20,000.
52	5/15/2024	43001.042, 43002.092	<p>Would it be possible to be provided the language/format 30/40 calendar days prior instead of 20 calendar days prior?</p>	FSA will provide the language as early as possible
53	5/20/2024	Follow-up to Q24	<p>What is the naming convention and format? CSV?</p>	The file format is .csv. The naming convention is 18000_Discharge Data ReportV2_XXX_MMDDYYYY Where XXX is the servicer code
54	5/20/2024	Follow-up to Q34	<p>Based on the updated requirements Nelnet's assumption that we do not have to complete the recall process with DMCS.</p>	Correct
55	5/20/2024	Follow-up to Q35	<p>Can FSA add in where Measure 1, 2, 3 will fall in the discharge hierarchy spreadsheet, not just how they rank against each other? Does this mean that FSA will not be sending us loans that are on other discharge populations (D2D, BD,</p>	FSA will provide an updated hierarchy once available.

56	5/20/2024	Reporting Requirements	Please provide a copy of the sample file.	<i>The operational report template was provided with the CR.</i>
57	5/20/2024	General	CR6822 is not approved or implemented. We can add a forb time to our system, but the additional reporting is not part of CR7037. This would occur when CR6822 is implemented.	<i>Noted.</i>
1	5/8/2024	43000.010	What loan statuses should be included? If the borrower is in school and has an unsubsidized loan this would be over their principal balance. o 43000.010: The servicers shall submit to NSLDS the 9/1/2024 principal and interest balance of every loan on their system.	<i>Servicers are to report all loans, regardless of status, with a total balance greater than \$0. (43000.011)</i>
2	5/8/2024	43000.012	Are there concerns with NSLDS or FSA on size limitations? We are reviewing limits on the NN side as well. § 43000.012: Servicers shall include the submission within a unique, one-time NSLDS reporting batch.	<i>NSLDS does not have size limitations for FLS NSLDS submission files.</i>
3	5/8/2024	43000.014	Assumption there are no changes to the AQ record submission or data elements. § 43000.014: Servicers shall report the balances/send the batch file no earlier than 9/2/2024 but no later than 9/5/2024.	<i>Correct</i>
4	5/8/2024	43000.015	Please provide examples of what errors may be? Will there be a special process? Certain types of errors can be resolved in "bulk" others are manual 1 by 1. § 43000.015: Servicer shall resolve all errors or discrepancies identified by NSLDS or FSA by 9/6/2024. No cost can be associated with this requirement. Servicers are required to report timely and accurately.	<i>NSLDS will process the AQ record for the 9/1/2024 submission the same as current reporting. Each servicer should be aware of current error volume and examples.</i>
5	5/8/2024	43000.020	When will we receive the file? o 43000.020: The servicer shall accept a new Measure 1 forgiveness request file from NSLDS that contains at a minimum the data elements defined below:	<i>FSA will provide an update on when the file layouts will be provided.</i>
6	5/8/2024	43000.055	What if it does bring it to zero? How will we report this? § 43000.055: If the amount of forgiveness is greater than the amount of outstanding interest, the forgiveness amount remaining after forgiving interest (difference between the Amount of Forgiveness minus the reduction applied to Accrued Interest) shall be applied to principal. Note: The amount of forgiveness applied shall never result in the loan balance going to zero.	<i>The loan balance, as a result of the application of forgiveness for Measure 1, should not result in a zero balance. NSLDS determines the forgiveness amount at the loan level. If the reapplication of other servicing activity after the effective dates results in the balance going to zero that is separate from the forgiveness.</i>
7	5/8/2024	43000.061	Can we remove remaining balance and state borrowers can look on the servicer borrower secure site? § 43000.061: The notice to borrowers will be dynamic and include borrower specific elements such as borrower identifiers/loan identifiers, forgiveness amounts and remaining balances.	<i>The items listed within the requirements are variables that may be included in the letter text.</i>
8	5/8/2024	43000.062	We assume the notice will not change from file to file § 43000.062: Servicers will be provided the FSA approved Measure 1 forgiveness notice language/format no later than 20 calendar days prior to the servicers' receipt of the forgiveness file.	<i>FSA will provide the content. The content may change between file type.</i>
9	5/8/2024	43000.080	Please provide a file layout o 43000.080: The servicers shall provide Measure 1 forgiveness response information to NSLDS weekly as part of NSLDS reporting.	<i>FSA will provide an update on when the file layouts will be provided.</i>
10	5/8/2024	43000.080	What FMS reason codes will be used? 1. D1 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - \$20,000.	<i>FMS Reason Code 1133</i>
11	5/8/2024	43000.080	What FMS reason codes will be used? 2. D2 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited.	<i>FMS Reason Code 1134</i>

12	5/8/2024	43000.080	What FMS reason codes will be used? 3. D3 as the forgiveness Measure 2: Forgiveness after 20 Years.	FMS Reason Code 1135
13	5/8/2024	43000.080	What FMS reason codes will be used? 4. D4 as the forgiveness Measure 2: Forgiveness after 25 Years.	FMS Reason Code 1136
14	5/8/2024	43000.080	What FMS reason codes will be used? 5. D5 as the forgiveness Measure 3: Eligible for SAVE Forgiveness, Not Applied.	FMS Reason Code 1137
15	5/8/2024	43001.039	Is volume going to be available with this notification? § 43001.039: The servicer shall begin processing the Measure 2 forgiveness file immediately upon receipt and approval from FSA to begin the discharge. FSA will provide 5 calendar day notice prior to file receipt	Yes, FSA will provide the file volume when available.
16	5/8/2024	43001.041	Can we remove remaining balance and state borrowers can look on the servicer borrower secure site? Please define others, this is needed to determine what parameters and complexities need to be incorporated with our solution. § 43001.041: Servicers should anticipate the notice to the borrower will be dynamic and include borrower specific elements such as borrower identifiers/loan identifiers, forgiveness amounts and remaining balances (and possibly others).	FSA will provide the content, but servicers should assume the message will be similar in nature to the IDR Direct to Discharge confirmation notification that servicers use today.
17	5/8/2024	43001.042	We assume the notice will not change from file to file § 43001.042: Servicers will be provided the FSA-approved Measure 2 forgiveness notice language/format no later than 20 calendar days prior to the servicers' receipt of the forgiveness file	The content may change file to file.
18	5/8/2024	43002.092	We assume the notice will not change from file to file § 43002.092: Servicers will be provided the FSA-approved Measure 3 forgiveness notice language/format no later than 20 calendar days prior to the servicers' receipt of the forgiveness file	The content may change file to file.
19	5/8/2024	43003.010	Please provide a file layout o 43003.010: Measure 2 and 3 response information will be sent to NSLDS via SAIG weekly as part of NSLDS reporting. (with a new message class)	FSA will provide an update on when the file layouts will be provided.
20	5/8/2024	43005.010	What other testing is needed? o 43005.010: IST will test all new functionality and exchange of data with NSLDS (at a minimum).	See artifact listing in CR.
21	5/8/2024	43006.010	Could FSA include messaging to update their address with their servicer. o 43006.010: FSA will provide servicers a copy of the opt-out notification(s) prior to sending the opt-out notice to borrowers.	FSA will consider including this in the opt-out.
22	5/8/2024	43006.041	How will borrowers know which one will they want to opt out for? Will there be scripting for the call center? § 43006.041: Once a borrower opts out, they will not have the option to opt back in.	The borrower will opt out of all forgiveness types. FSA may provide additional scripting prior to the opt-out period beginning.
23	5/8/2024	General	What is the opt out period length?	FSA will provide additional information regarding the Opt-Out period prior to the notification being sent.
24	5/8/2024	43007.000	What is the forgiveness code you are referencing (only PSLF and TEACH. Forgiveness is not in the EA27 transfer process or 18000 transfer process. - 43007.000: The servicers shall include updated forgiveness codes within all existing transfer processes and procedures (sending and receiving of loans to all other federal servicers and DMCS).	The forgiveness code referenced in requirements 43003.030, 43000.083, 43001.011.

25	5/8/2024	43008.000	<p>What specifics/data need to be displayed?</p> <ul style="list-style-type: none"> 43008.000: The servicers shall update borrower facing websites to display and define forgiveness that has been applied to borrower's account(s) on the servicing system. 	<i>The servicer shall display the type of forgiveness applied. FSA will provide the text for each measure.</i>
26	5/8/2024	43009.000	<p>Can we automate the box.com process?</p> <ul style="list-style-type: none"> 43009.000: The servicers shall support twice daily operational reporting and submit the reports NLT 11am ET and 4pm ET each day via Box.com until the initial Measures 1, 2 and 3 discharge files are complete. See SDR Operational Reporting Template for additional details. 	<i>FSA previously provided instructions related to this question. Box.com cannot be automated, but there is the ability to sync with your desktop in a file explorer view.</i>
27	5/8/2024	General	Can you provide timeline example for each measure on the expected flow?	<i>The notification timelines and timeliness requirements are in the change request.</i>
28	5/8/2024	43000.012	We are seeking clarification if this unique, one-time NSLDS reporting batch will be some variation of the AQ.	<i>No, there will be no variation from the AQ Record type.</i>
29	5/8/2024	General	Is FSA going to dictate which servicer reports on which date or could NSLDS take the submission from all servicers on the same day?	<i>No, the servicers can deliver on the same day.</i>
30	5/8/2024	General	Does FSA want us to stop reporting the AQ records as part of our normal weekly submission for the week of 9/2?	<i>No, the servicer shall submit the AQ record as part of the one time submission and part of the batch process.</i>
31	5/8/2024	General	Will FSA be creating a webpage on Studentaid.gov to house information on these measures for borrowers? (It would help all servicers to be able to have a single location to drive borrowers for the most current and accurate information.)	<i>FSA has already updated StudentAid.gov with the measures (link below). Additional information will be added for example opt-out. FSA may add additional content to StudentAid.gov. https://studentaid.gov/manage-loans/forgiveness-cancellation/debt-relief-info</i>
32	5/8/2024	Existing Reporting	With these Discharge changes, does the Monthly Discharges/Discharge Aging report need updated 11016/11017?	<i>No, FSA will not modify this report since we'll leverage the temp reporting under the CR.</i>
33	5/8/2024	43000.010 - 43000.014	<p>Should the unique, one-time NSLDS reporting batch ONLY contain AQ records?</p> <ul style="list-style-type: none"> •Is it acceptable for Nelnet and CRI to submit the one-time reporting on the same day (9/2/2024)? •Should the regular, weekly submittal file on 9/3 (CRI) and 9/5 (Nelnet) no longer include AQ records? This is when we normally would submit AQ records for the month of September. We will need to remove them from reporting if they should not be included. 	<i>Yes, multiple servicers may submit the AQ record on the same day. No, the AQ record type should still be included in normal weekly batch submissions.</i>
34	5/9/2024	Measure 3	If a borrower has defaulted to DMCS, does the servicer need to recall the loan back to their servicing system to provide the borrower the discharge? Since measure 3 is ongoing, this may eventually overlap with loans that will default in the future.	<i>See updated CR requirements.</i>
35	5/9/2024	Hierarchy	Can FSA add Measure 1, 2, and 3 into the discharge hierarchy so that servicers have clear priority of which discharge takes priority if multiple are in motion or one has been previously processed?	<i>FSA is building the hierarchy into the NSLDS files and the servicer should discharge as instructed in the file. However for awareness the hierarchy is - Measure 3, Measure 2, then Measure 1.</i>
36	5/9/2024	Measure 2	Does the administrative forbearance added for Measure 2 and 3 override other deferments, forbearances or \$0 PFH that may be on the account?	<i>No</i>
37	5/9/2024	43006.010	In requirement 43006.010, FSA sends communication to the borrower prior to the servicers receiving the population. If a borrower calls in and the Servicers don't have the list of borrowers or measure information, Servicers will not be able to correctly opt the borrowers out of the measure. What will be the timing of the borrower communication and servicers receiving the debt relief files?	<i>If a borrower calls to opt-out before the specific populations are identified - they are opting out of all three measures.</i>
38	5/9/2024	General	Will the borrowers receive notification of eligibility for multiple types of measures at the same time?	<i>FSA will provide more information regarding the opt-out.</i>

39	5/9/2024	43006.05	<p>With respect to requirement: "43006.050: FSA will notify the servicers of the length of the opt out period prior to the opt-out period beginning."</p> <p>Can you further explain how the opt-out period will be defined by answering the following questions: (Similar to above question we have)</p> <ul style="list-style-type: none"> •Will there be a separate opt-out period for each measure? •Will the opt-out period be a fixed period of time (e.g., 20 days, 3 weeks) for each measure or will it be variable based on the type of measure, holidays, etc.? 	<p>1. No</p> <p>2. Yes, the opt-out will be a fixed period of time for all three measures and all three measures will have the same time period.</p>
40	5/9/2024	General	<p>When a borrower has a loan that qualifies for more than one measure... How will the measure be decided?</p> <ul style="list-style-type: none"> •For example: Will FSA determine that?, Will the borrower have the option to choose? •Will the loan servicer be expected to answer how the measure was chosen for their loan(s)? 	<p>1. FSA will determine the hierarchy of loans. At this time we are prioritizing Measure 3 forgiveness. Borrowers will not have the option to choose.</p> <p>2. No and FSA may provide additional talking points and will update StudentAid.gov with additional information and FAQs.</p>
41	5/9/2024	Add'l comm	<p>Shall the loan servicer communicate to the borrower (e.g., on the borrower facing website) with the specific details of how they qualified for the debt relief they receive? (e.g., your loan is older than 20 years and has X balance, therefore you were granted Debt Relief based on Measure 2)</p>	See question 25.
42	5/9/2024	Add'l comm	<p>What other types of communication channels are servicers going to need to plan for?</p>	Similar to the previous DR efforts the servicers should expect FSA communications about this discharge.
44	5/10/2024	Measures 2 & 3	<p>If a borrower has 3 loans, but one loan is forgiven, are the payments made on the forgiven loan to be refunded to the borrower or reallocated proportionally across remaining loans on system?</p>	For measures 2 and 3 the payments should be refunded.
45	5/10/2024	Measures 2 & 3	<p>Any payments that came in after the effective date, should we refund to borrower OR try to reallocate across remaining loans?</p>	The payments should be refunded.
46	5/10/2024	General	<p>When sending any files, can FSA please include @AidvantagePMO in the distribution?</p>	Noted.
47	5/10/2024	43000.080 & 43003.010	<p>For this response how does FSA want the information passed on? Our assumption is that it is not part of the normal NSLDS submission.</p>	The CR requires the response be sent weekly.
48	5/10/2024	43001.020	<p>Is the indicator going to be included in the file that we receive?</p>	Yes
49	5/10/2024	43001.031	<p>Which fine grain forbearance would this administrative forbearance tie back to?</p>	AD22: IDR Forgiveness Opt-Out Period
50	5/10/2024	43006.030	<p>What is the expected timeframe for the opt out to be updated on NSLDS?</p>	The opt-out should be reported within 2 business days.