



Oregon
Tina Kotek, Governor



Dec. 27, 2024

The Honorable Miguel Cardona
Secretary of Education

The Honorable James Kvaal
Undersecretary of Education

U.S. Department of Education
400 Maryland Ave., SW
Washington, D.C. 20202

Dear Mr. Secretary and Mr. Undersecretary,

As state student loan ombuds and advocates, the undersigned support the steps the U.S. Department of Education has taken toward resolving long-standing issues with the federal student loan system – including implementing the one-time income-driven repayment (IDR) account adjustment, joint consolidation loan separation, and changes to the Public Service Loan Forgiveness (PSLF) program.

Unfortunately, not all steps of the one-time IDR account adjustment have been completed.

Of the tasks left unfinished, we believe it is crucial that borrowers be able to see how many months they have earned toward eventual IDR forgiveness. We are advocating for the prioritization of publishing this data before the upcoming administration transition.

First announced in April of 2022,¹ the one-time IDR account adjustment was expected to be completed by December 2023. One year after that estimated completion date, it has yet to be fully executed and borrowers cannot see their payment counts. While the legal challenges against the Saving on a Valuable Education (SAVE) plan have understandably added difficulty to discharges under IDR programs, we do not believe this should prevent the department from the publication of progress toward forgiveness.

We are asking that the department publish months of progress earned toward 25 years for all borrowers, as a 25-year forgiveness period is not at question in the current lawsuits.

¹ “Department of Education Announces Actions to Fix Longstanding Failures in the Student Loan Programs.” U.S. Department of Education, April 26, 2022. <https://www.ed.gov/about/news/press-release/departments-of-education-announces-actions-fix-longstanding-failures>.

Based on the department's press releases, the IDR account adjustment page on studentaid.gov,² and encouragement from Federal Student Aid, state advocates and ombuds urged borrowers to consolidate through industry guidance and raised awareness around the country. As a result, thousands of borrowers consolidated their loans anticipating the ability to have all months in repayment counted toward forgiveness and to see how many months toward IDR cancellation they earned. Without published IDR counts, borrowers will not be able to see their progress toward IDR forgiveness and may not take necessary steps toward forgiveness under whatever program may exist in the future.

The original goal for the IDR adjustment was to correct long-standing servicer errors and patterns of account mismanagement. Borrowers enrolled in IDR plans starting in 1994³ with the expectation that eventually, after fulfilling monthly obligations for 20 to 25 years, the loan would no longer follow them. This long history of poor recordkeeping, forbearance steering, and countless loan transfers mean borrowers are in the dark on their total number of IDR payments.

First in 2010, and later in the 2020s, borrowers were pushed to consolidate their loans to access benefits that they – in many cases – believed were already associated with their existing federal student loans. The resulting loan history is gnarled, riddled with holes, and blurry around the edges. A borrower who took out loans in 1999 may have consolidated two or three times by now, and the history of each underlying loan may not have always followed the consolidation. The borrower may be certain they have made more than 25 years of payments, but without being able to see an accurate payment count, what recourse does the borrower have when a servicer continues to bill them?

Today, PSLF eligible and ineligible months of repayment are visible to borrowers on their studentaid.gov accounts. We encourage the department to fulfill its 2022⁴ commitment that IDR months would be similarly viewable.

Without transparent tracking of progress toward IDR forgiveness, borrowers are not able to self-advocate (e.g., investigate missing payment history), nor do they have the critical information needed for informed decision-making about their loan repayment strategy.

As it stands, student loan borrowers have no singular way to access their detailed payment history. Publishing months of progress toward IDR forgiveness will add transparency to a complicated system.

We urge the department to prioritize publishing the months borrowers have earned toward IDR forgiveness before the upcoming administration transition.

As state advocates and ombuds, we feel it is vital to follow through with this commitment to avoid further harming borrowers. Publishing data about how many IDR eligible months

² "Payment Count Adjustments Toward Income-Driven Repayment and Public Service Loan Forgiveness Programs." Federal Student Aid. Accessed Dec. 18, 2024. <https://studentaid.gov/announcements-events/idr-account-adjustment>.

³ "34 CFR 685.209 Income-Driven Repayment Plans." Code of Federal Regulations, Nov. 15, 2024. [https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-685/subpart-B/section-685.209#p-685.209\(k\)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-685/subpart-B/section-685.209#p-685.209(k)).

⁴ "Department of Education Announces Actions to Fix Longstanding Failures in the Student Loan Programs." U.S. Department of Education.

borrowers have earned is crucial to undoing some of the damage caused by poor servicing and oversight. Thank you for your consideration.

Sincerely,

Lane Thompson

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Oregon student loan ombuds

Celina Damian

California student loan servicing ombudsperson

Evelyn Castro

Nevada student loan ombudsman

Amber Hay

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