

Education Debt Consumer Assistance Program

Managing Student Loan Debt Amid COVID-19

Presented by EDCAP, a new CSS Program Initiative

Presenters: Carolina Rodriguez and Nancy Nierman

Contact Us: By Phone 1-888-614-5004 By Email: edcap@cssny.org



Agenda

- About EDCAP
- CARES Act and NYS Updates
- Managing Student Loans/Developing a Strategy
- Loan Forgiveness Programs
 - Public Service Loan Forgiveness (PSLF)
 - Other Forgiveness/Discharge Programs
- Resources





About EDCAP





Who We Are

- EDCAP is a program initiative of the Community Service Society.
- Created to help tackle the student debt crisis in New York.
- Offers free and unbiased services.
- EDCAP's goal is to expand statewide.







What We Do

- Advise on student loan repayment options.
- Rehabilitate loans to help prevent wage garnishments, social. security offsets and tax intercepts.
- Apply for loan forgiveness, cancellation and discharge.
- Help consolidate loans, request deferments, and forbearances.
- Resolve issues with loan servicers and lenders.





CARES Act Relief





CARES Act overview

- The Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law on March 27th and provides student loan borrowers with some relief.
- The relief only applies to:
 - Federal student loans owned by the U.S. Department of Education .
- It does not apply to
 - Private Loans
 - Perkins Loans
 - Commercially-held Federal Family Education Loan (FFEL)
- How do I know which loans I have?
 - Call your student loan servicer, 800-4-FED-AID.
 - Look at your Federal Student Aid account—studentaid.gov.
 - Call us 888-614-5004.





CARES Act relief

Suspension of payments

- From March 13, 2020- September 30, 2020 .
- Done through an administrative forbearance.
- Automatic—you don't have to do anything and auto pay will be suspended .
- Can request a refund from your servicer if you paid after March 13^{th.}
- You should have been notified by your servicer of these changes by 4/10.
- For credit reporting, suspended payments will show as having been paid.
- Zero interest rate during suspension period
 - Any payments made will be applied to the principal.
- Suspension of involuntary collection (collection of wage-garnishments, tax intercepts, and social security/disability offsets are suspended)
- No collection activity for defaulted loans



Forgiveness programs

- Suspended payments <u>WILL COUNT</u> towards loan forgiveness (general and Public Service Loan Forgiveness (PSLF)).
- As of now, for payments to count for PSLF, you must meet all other eligibility requirements, like be...
 - enrolled in an Income Driven Repayment Plan and
 - work full-time for a qualifying employer.





Rehabilitation

- If you are in (or are starting) rehabilitation to take your loans out of default:
 - required rehabilitation payments also qualify for suspension;
 - suspended payments **should c**ount toward the 9 required payments;
 - if you can pay, it may be best to avoid issues.





Wage garnishments

- Wage garnishments are also suspended.
- It may take some time for employers to be notified and for this to take effect.
- You may get a letter informing you of this temporary suspension and the possibility of a refund if your wages were garnished after March 13^{th.}





Tax intercepts

- Tax intercepts to pay for defaulted student loans are also suspended.
 - You can now file your 2019 taxes and not have the refund intercepted.
 - For intercepts "posted" on or after 3/5/2020 with U.S. Department of Education, you should be able to get it back .
- You can call **800-621-3115** to confirm if you could get your 2019 tax intercept if you filed your taxes before March 13th.





Social Security/Disability Offsets

- Offsets are suspended.
- People should be getting full benefit by now.
- Zero interest on defaulted loans should also apply.
- Some may get a refund if their offset occurred after March 13th.





Notices

- You should have received a notice from your servicer about the CARES Act payment suspension, zero interest, or other relevant benefits by April 10.
- In August you should get notices about resuming payments.
 - Note: There is still a question of whether interest accumulated prior to March 13th will be capitalized after the administrative forbearance (payment suspension) is over.
- Notices only apply if you have federal student loans covered under the CARES Act.





NYS Action (relief)





NYS Department of Financial Services (DFS)

- DFS entered into an agreement with student loan services handling private and commercially held FFEL loans to provide borrowers some relief.
- The following applies to loans <u>not</u> covered by the CARES Act (Private and some Perkins and commercially -held FFEL loans).
 - Up to 90 days of payment forbearance (payments will be suspended but interest may accrue)
 - Up to 90 days of waived late fees
 - Up to 90 days of no negative credit reporting
 - No collections activity for 90 days
- Contact your servicer to report an economic hardship and receive this relief.
- Collection activities have also been suspended for debt owed directly to CUNY or SUNY schools.



CARES Act Common Q&As





Q&As

- Do you have to experience an economic hardship to get the CARES Act payment suspension?
 - No. It is automatic.
- Will borrowers who are in default get their stimulus check?

- Yes.

- Can I get a refund for payments made on or after March 13^{th?}
 - Yes. Call your servicer to request a refund.
- If I made a payment in March, will that go to principal?
 - Some may go to the interest that had accumulated prior to March 13th.
 Payments made after that date should be applied to your principal.
- My loans are in default, is the interest suspended?
 - For federally owned loans, yes. For commercially held loans, they might not.





Q&As(cont'd)

- My tax refund was intercepted to pay my defaulted student loans, can I get it back?
 - If your intercept was "posted" before March 5th, you may be able to get it back. Call 800-621-3115 (the Default Resolution Group) to find out.

• Have social security offsets stopped?

- Yes. People should be getting their full social security or disability benefit if they were being offset. Some people may get a refund for March offsets.
- Have collections for commercially held loans stopped?
 - They should have stopped.
- My loans are in default, can I start a rehabilitation?
 - You should be able to.





Q&As(cont'd)

- Can you consolidate a loan with a wage garnishment in place prior to March 13th?
 - Don't know. Defaulted loans subject to wage garnishment are usually not eligible for consolidation to get out of default. Contact your servicer.
- Can you apply for Income Driven Repayment plan during the suspension?
 - Yes.
- I am due to recertify my Income Driven Repayment plan before September 2020, should I do it?
 - Out of precaution, you should recertify.
- What happens if you are making standard repayment plans?
 - It is possible that your repayment time may be extended to account for the suspended months.



Managing Student Loans/ Developing a Strategy





Three steps to managing student loans in good standing (aka non-defaulted loans)



Understand your student loans









1 Understand your student loans

- The types of loans you have (federal, private, commercially-held).
- The amount and interest rate.
- The effect of capitalization.
- Your servicer(s) and their role.







Loan programs

- The William D. Ford Federal Direct Loan Program-Loans come directly from the Federal Government.
 - Direct **Subsidized** Loans-The government covers unpaid interest during certain periods.
 - Direct **Unsubsidized** Loans-The borrower is generally responsible for interest accrued.
 - Direct **Plus Loans for Graduates and Professionals**-only unsubsidized loans available. Credit check required.
 - Direct **Plus Loans for Parents**-Offered to parents of college students. Only unsubsidized loans available. Credit check required.
 - Direct **Consolidation Loans**-Allow borrower to combine loans for ease of administration. Does not lower interest rates.
 - Federal Family Education Loan (FFEL)-Loans came from banks, guaranteed by the Federal Government. <u>This loan program is no longer available.</u> Some <u>may not</u> qualify for CARES Act.
 - Federal **Perkins Loans**-Federal Government subsidized loans offered to students with great financial need directly through the school. <u>This loan program is no longer available.</u>

FEDERAL STUDENT LOANS ARE ONLY OFFERED THROUGH THE DIRECT LOAN PROGRAM TO NEW BORROWERS.



Access your federal student loan information

• Visit studentaid.gov and Log In with your FSA ID.





Federal student loans overview page



2 Set a repayment goal

- Determine your income and expenses and payment priorities.
- Most people usually choose one of two paths:



Source: Images by Federal Student Aid

Community Service | Fighting Poverty Strengthening New York



³ Enroll in and maintain a repayment plan

- The Standard Plans: Payments are based on size of loan, interest rate and ٠ pre-determined payback period. They are not based on your income.
 - 10-30 Year Standard Fixed
 - 10-30 Year Graduated
 - Extended Fixed (Up to 25 years)
 - Extended Graduated (Up to 25 years)

Caution: Standard Repayment Plans **DO NOT** gualify for Public Service Loan Forgiveness.

- Income-Driven-Repayment (IDR) Plans: Payments and payback period are ٠ based on your Adjusted Gross Income and family size.
 - Revised Pay As You Earn (REPAYE)
 - Pay As You Earn (PAYE)

Communitv

- Income Based Repayment (IBR)
- Income Contingent Repayment (ICR)



Understanding Deferment and Forbearance

- Short-term relief from student loan payments.
 - Interest may not accrue on some loans during a **defermen**t but will accrue on all loans in **forbearance**.
 - Limits on how many deferments and forbearances one can take during the life of a loan.
- These options may be right if you can't make a partial or full payment temporarily. If your situation is ongoing, **explore IDR plans as an alternative.**
- Payments made under IDR, even if they are low or zero, will still count toward forgiveness and you avoid capitalization.

Caution: Loan servicers will often push borrowers into Deferment and Forbearance. Each time you come out of a Deferment or Forbearance unpaid interest capitalizes. This can add unnecessary costs to a loan.





Income Driven Repayment (IDR) Plans

- Based on your income and family size.
- 10%-20% of your discretionary income.
- Discretionary Income = Adjusted Gross Income 150% of the Federal Poverty Level for your family size.*
 - Single borrowers earning less than \$19k, payments are \$0
 - Family of four earning less than \$39k, payments are \$0
- Annual recertification of your income, tax filing status and dependents is required. It can be done online if you file taxes.
- The FSA Loan Simulator can be a helpful tool to guide you towards the best Repayment Plan: <u>https://studentaid.gov/loan-simulator/</u>

*ICR uses 100% of FPL.





Income Driven Repayment (IDR) Plans

REPAYE (Revised Pay As You Earn)

- Payments are **10%** of discretionary income
- Direct loan holders are eligible; FFEL & Perkins borrowers may consolidate into a Direct Consolidation Loan to become eligible*

PAYE (Pay As You Earn)

- Payments are **10%** of discretionary income
- New borrowers only (2007 or later) qualify
- Same loan eligibility as REPAYE plan*

IBR (Income Based Repayment)

- Payments are **10-15%** of discretionary income.
- Most loans qualify
- The only IDR available to FFEL loan holders who do not consolidate into a Direct Consolidation Loan*

ICR (Income Contingent Repayment)

- Payments are ~20% of discretionary income
- Only IDR available to Parent PLUS borrowers if they consolidate into a Direct Consolidation Loan.
- **REPAYE and ICR** have no cap on payment. You can pay more than the standard plan if your income is high. PAYE and IBR cap payment at the standard plan amount.
- **REPAYE** based on household income regardless of tax filing. For the rest, it is based on the borrower's income only if they file "married, filing separately."
 - * Direct Consolidation Loans paying off Direct or FFEL Parent Plus loans are only eligible for the ICR plan.

Tip: These qualify for Public Service Loan Forgiveness.





Meet Sandy

R	2

- Federal Student Loans: \$40,000
- Annual Adjusted Gross Income: \$50,000
- Household Size: 1

	STANDARD REPAYMENT		INCOME-BASED REPAYMENT (IBR)	
Monthly Payment (Start)	\$434		\$261	
Monthly Payment (Max)	\$434		\$349	
Total Paid	\$52,093		\$64,299	
Paid Off By	March 2030	(10 years)	December 2037	(17 years)
Forgiveness Amount	\$0		\$0	





Meet Jake

- Federal Student Loans: \$100,000
- Annual Adjusted Gross Income: \$85,000
- Household Size: 3 (head of household)

	STANDARD REPAYMENT		INCOME-BASED REPAYMENT (IBR)	
Monthly Payment (Start)	\$1,085		\$442	
Monthly Payment (Max)	\$1,085		\$613	
Total Paid	\$130,232		\$125,397	
Paid Off By	March 2030	(10 years)	March 2040	(20 years)
Forgiveness Amount	\$0		\$78,890	
ommunity				

Meet Heather



Č

- Federal Student Loans: \$80,000
- Annual Adjusted Gross Income: \$45,000
- Household Size: 1
- PSLF: Yes (works for non-profit)

	STANDARD REPAYMENT	REVISED PAY AS	S YOU EARN (REPAYE) REPAYMENT	
Monthly Payment (Start)	\$908		\$219	
Monthly Payment (Max)	\$908		\$255	
Total Paid	\$109,006		\$28,304	
Paid Off By	March 2030	(10 years)	March 2030	(10 years)
Forgiveness Amount	\$0		\$91,848	
ommunity ervice Fighting Poverty edcap				34

Managing Defaulted Student Loans





Overview: Defaulted Loans

- After 270 days of non-payment, federal student loans are in default.
- The loans are now due immediately and in full.
- You are no longer eligible for Title IV funding (financial aid).
- Wages are subject to garnishment, tax refunds and other assets may be seized.

If you manage your loans properly, there should be no reason to default. But if you do there are options:

- 1) Rehabilitation
- 2) Consolidation

In both cases, once a default is cured, you will be back in good standing with the DOE, access to Title IV funding will be restored and you should be free from the threat of wage garnishments and asset seizure.




Defaulted Loans: Options

1) Rehabilitation:

- Make 9 payments on time in full in 10 months.
- When you have successfully completed the rehabilitation, the default will be removed from your credit report but the delinquencies that led up to the default may remain.
- You must call the debt collector to start this process. If you do not know who that is, call the Department of Education Default Resolution Group at 1-800-621-3115 or consult your FSA Home Page: <u>https://studentaid.gov/</u>
- You only get one chance at rehabilitation.

2) Consolidation:

- Replace your defaulted loan with a new loan.
- Unpaid interest on your defaulted loan will be capitalized.
- Can be done <u>online</u>.
- Consolidation cures the default faster than rehabilitation but does not remove it from your credit report.





Tip: If you consolidate without the help of the debt collector, you may be able to save on collection fees. This can be a few thousand saved!

Managing Private Loans





Handling private student loans

- If you are current on your student loans:
 - Contact your private loan servicer/lender to explore your options.
 - Private loans do not have the same repayment options and protections as federal student loans. But they may have some options during this crisis.
- If you have stopped paying your private loans, be mindful of reviving the statute of limitations. In NY it is 6 years. This means that a lender cannot sue you for the debt owed if the statute of limitations has passed.





Handling private student loans (cont'd)

- READ THE PROMISSORY NOTE! It will have information about the statute of limitations. Your loans may be subject to another state's Statute of Limitations.
- Running a credit report may help firm-up this date.
- Co-signers beware. Co-signers' credit will be impacted if the student borrower defaults.





Getting Help to Pay Off Your Student Loans: Loan Forgiveness and Discharge Programs







Public Service Loan Forgiveness Programs (PSLF)





Public Service Loan Forgiveness (PSLF)

PSLF forgives the remaining balance on your Direct Loans under the following circumstances:

1	2	3	4	5
You have qualifying loans ("Direct" loans)	Made 120 qualifying monthly payments (10 years)	Under a qualifying repayment plan	While working full-time	For a qualifying employer

Forgiven loan amounts are <u>NOT SUBJECT TO INCOME TAXES</u> under this program.





Other Loan Forgiveness and Discharge Options





Forgiveness/discharge options

- Get On your Feet (for NYS residents only)
- Teacher Loan Forgiveness
- Total and Permanent Disability Discharge (TPD)
- School Closure Discharge
- Perkins Loans Cancellation
- Borrower Defense to Repayment (BDR)
- New York State Options (HESC)
- See resource section for links to more information





What if things go wrong?





Resolving issues

- Contact us! We may be able to help. If you recently got rejected for PSLF, you may be eligible for Temporary Expanded PSLF.
- You can also submit a complaint to your servicer and in NYS to the Department of Financial Services: <u>dfs.ny.gov/complaint</u>
- If you don't get a response or you get a response you disagree with, you can escalate by filing a complaint to DOE's Ombudsman Group through their <u>Online Feedback System</u>, or by calling 877-557-2575.











Income-Driven-Repayment (IDR) Plans, Part 1

Plan Feature	REPAYE	PAYE	IBR	ICR
Payment Amount	10% of Discretionary Income	10% of Discretionary Income	Not more than 15% of Discretionary Income	Lesser of 20% of Discretionary Income or 12 Year fixed payment plan
Income Eligibility	None.	"Partial Financial Hardship" Required	"Partial Financial Hardship" Required	None.
Borrower Eligibility	Direct Loan borrower with eligible loans.	"New Borrower" with eligible loans.	Direct or FFEL Loan borrower with eligible loans.	Direct Loan borrower with eligible loans.
Cap On Payment	None. Payment may exceed 10 Year Standard Plan	Not more than Standard 10 Year Plan	Not more than Standard 10 Year Plan	None. Payment may exceed 10 Year Standard Plan
Interest Subsidy	Subsidized Loans- Unpaid interest is 100% covered for the first 3 years and 50% covered thereafter. Unsubsidized Loans- Unpaid interest is 50% covered for life of the loan.	Subsidized Loans- Unpaid interest is 100% covered for the first 3 years.	Subsidized Loans- Unpaid interest is 100% covered for the first 3 years.	None. Borrower is responsible for paying all interest that accrues.





Income-Driven-Repayment (IDR) Plans, Part 2

Plan Feature	REPAYE	PAYE	IBR	ICR
Married Borrowers	Payment is based on combined income and loan debt of you & your spouse regardless of how you file taxes.	Payment is based on your income and loan debt alone only if you file taxes "Married & Separately"	Payment is based on your income and loan debt alone only if you file taxes "Married & Separately"	Payment is based on your income and loan debt alone only if you file taxes "Married & Separately"
Interest Capitalization	Interest is capitalized if you fail to re-certify or if you leave the plan voluntarily.	Interest is capitalized if you no longer meet the "Partial Financial Hardship" requirement, if you fail to re-certify or if you leave the plan voluntarily. Interest will capitalize until the outstanding principal is 10% greater than it was when you entered the plan.	Interest is capitalized if you no longer meet the "Partial Financial Hardship" requirement, if you fail to re-certify or if you leave the plan voluntarily. There is no cap on the capitalization.	Unpaid interest is capitalized annually until the outstanding principal is 10% greater than it was when your loans entered repayment.





Income-Driven-Repayment (IDR) Plans, Part 3

Plan Feature	REPAYE	PAYE	IBR	ICR
Forgiveness Period	Eligible undergraduate loans: Remaining balances are forgiven after 20 years of qualifying payments. Eligible graduate loans: Remaining balances are forgiven after 25 years of qualifying payments. Forgiven balances may be taxable.	Remaining balances are forgiven after 20 years of qualifying payments. Forgiven balances may be taxable.	Remaining balances are forgiven after 20 years if you are a "New Borrower" (after July 1, 2014) or 25 years if you are an "Old Borrower" (before July 1, 2014). Forgiven balances may be taxable.	Remaining balances are forgiven after 25 years of qualifying payments. Forgiven balances may be taxable.



Federal Student Aid (FSA): ID-Home Page-Loan Simulator

1. FSA ID: <u>https://fsaid.ed.gov/npas/index.htm</u>

• Use this link to create a new FSA ID or manage your existing FSA ID:

2. FSA Home Page: <u>https://studentaid.gov/</u>

- View your federal student loan information on this site:
 - 1) Login with your FSA ID. This brings you to your "Dashboard"
 - 2) In the "My Aid Box" click on "View Details"
 - 3) Click "View Breakdown" to get list of loans by servicer
 - 4) Click "View Loan Details" under each servicer for list of loans by servicer.
 - 5) Click "View Loan Details" within individual loans for more detailed information including loan type, principal and interest breakdown.
 - 6) Click "View Loan History" for detailed list of repayment, deferment and forbearance dates.
- 3. Student Loan Simulator: <u>https://studentaid.gov/loan-simulator/</u>
 - See what repayment plans you are eligible for and estimate your payments on those plans.
 - 1) Login with your FSA ID or click "Start from Scratch" to enter loans manually
 - 2) Step #1- Click the items that apply to you
 - 3) Steps #2-#5- Fill in personal information
 - 4) Step #6-If you logged in with your FSA ID, your loans will automatically show up. If you "Start from Scratch", manually enter loans.
 - 5) Step #7-Indicate interest in Public Service Loan Forgiveness (PSLF) ONLY IF APPLICABLE!
 - 6) Step #8- Select your Repayment Goal.
 - 7) Click "View and Compare all Plans" to see all options.
 - 8) Student Loan Simulator can also be accessed via the FSA Home Page to the right of your Dashboard.





Additional Information and Applications

- Borrower Defense to Repayment (BDR): <u>https://studentaid.gov/manage-loans/forgiveness-</u> <u>cancellation/borrower-defense</u>
 - Borrower Defense to Repayment (BDR) Application: <u>https://studentaid.gov/sites/default/files/borrower-defense-application.pdf</u>
- Borrowing Limits (Federal Student Loans): <u>https://studentaid.gov/understand-aid/types/loans/subsidized-unsubsidized#how-much</u>
- Curing Defaulted Loans (Rehabilitation & Consolidation): <u>https://studentaid.gov/manage-loans/default/get-out</u>
- Deferment and Forbearance: <u>https://studentaid.gov/manage-loans/lower-payments/get-temporary-relief#what-are</u>
- EDCAP Website: <u>https://www.edcapny.org/</u>
- FAFSA General Info: <u>https://studentaid.gov/apply-for-aid/fafsa/filling-out</u>
- FAFSA Deadlines: https://studentaid.gov/apply-for-aid/fafsa/fafsa-deadlines
- FAFSA Estimate Aid (FAFSA4caster): <u>https://studentaid.gov/understand-aid/estimate#how-use</u>
- FAFSA Awards Letter Comparison Tool (College Covered): <u>https://www.collegecovered.com/award-letter-tool/</u>
- Federal Student Aid (FSA) Information Center: <u>https://studentaidhelp.ed.gov/app/home/site/studentaid</u>
- Higher Education Services Corporation (NYS-Loan Forgiveness Program): <u>https://www.hesc.ny.gov/repay-your-loans/repayment-options-assistance/loan-forgiveness-cancellation-and-discharge.html</u>



Additional Information and Applications

- Income Driven Repayment (IDR) Plan Application: <u>https://static.studentloans.gov/images/idrPreview.pdf</u>
- Loan Consolidation: https://studentaid.gov/app/launchConsolidation.action
 - Loan Consolidation Application: <u>https://studentaid.gov/app/lcHtml.action</u>
- Public Service Loan Forgiveness (PSLF): <u>https://studentaid.gov/manage-</u> loans/forgiveness-cancellation/public-service
 - PSLF-Employment Certification Form (ECF): <u>https://studentaid.gov/sites/default/files/public-service-employment-certification-form.pdf</u>
 - PSLF-Application: <u>https://studentaid.gov/sites/default/files/public-service-application-for-forgiveness.pdf</u>
 - Temporary Expanded Public Service Loan Forgiveness (TEPSLF): <u>https://studentaid.gov/manage-</u> <u>loans/forgiveness-cancellation/public-service/temporary-expanded-public-service-loan-forgiveness</u>
- School Closure Loan Discharge: <u>https://studentaid.gov/manage-loans/forgiveness-</u> <u>cancellation/closed-school#main-content</u>
 - School Closure Loan Discharge Application: <u>https://studentaid.gov/sites/default/files/closed-school-</u> <u>loan-discharge-form.pdf</u>
- Teacher Loan Forgiveness: <u>https://studentaid.gov/manage-loans/forgiveness-</u> <u>cancellation/teacher</u>
- Total Permanent Disability (TPD-Nelnet): https://www.disabilitydischarge.com/
 - TPD Application: <u>https://secure.disabilitydischarge.com/Static/ApplicationOnlinePreview.html</u>



Questions?

Thank you for your participation!



