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The Next Front?

STUDENT LOAN SERVICING AND THE COST
TO OUR MEN AND WOMEN IN UNIFORM

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SUMMARY

Like their fellow Americans, many servicemembers have student loan debt. Congress has enacted a number of protections and benefits for servicemembers to help manage their student loan debt. Unfortunately, the complexities of these provisions, together with problems in loan servicing, have created difficulties for many military families when attempting to manage their debt.

According to National Center for Education Statistics, the average cumulative amount of student loan debt for active-duty servicemembers graduating from college in 2008 was \$25,566.¹ With over two million men and women serving in the military, ensuring access to clear information about how to successfully manage this debt is critical.

In this report, we identify a range of challenging issues for servicemembers with student loans, including:

Many servicemembers are adopting less favorable repayment plans, which may lead to thousands of dollars in excess debt. Postponing loan payments through deferment or forbearance can seem like an ideal option, but could cost servicemembers tens of thousands of dollars over the lifetime of their loans. Providing information about alternative repayment options could help servicemembers avoid a significant amount of unnecessary debt.

Servicemembers may face barriers when requesting and retaining protections afforded by the Servicemembers Civil Relief Act (SCRA). Many servicemembers may not have access to the full range of benefits afforded to them due to servicing errors and complex eligibility requirements.

In the aftermath of the financial crisis, the United States Government Accountability Office reported that there were, “at least 15,000 instances of financial institutions failing to properly reduce servicemembers’ mortgage interest rates and over 300 improper foreclosures...identified by federal investigations and financial institutions.”² The student loan servicing complaints and stories received by the Consumer Financial Protection Bureau (CFPB) raise concerns that problems confronted by military borrowers are not confined to the mortgage market. This report provides guidance to organizations providing support to servicemembers with student loans and to financial institutions that seek to provide adequate customer service to these borrowers. We also highlight issues for policymakers so that they may better understand the challenges faced by servicemembers with student loans.

This report is intended to expand upon the CFPB’s Student Loan Ombudsman’s report by highlighting specific issues servicemembers face with private and federal student loans.

THE CONSUMER FINANCIAL PROTECTION BUREAU

In the Dodd-Frank Wall Street Reform and Consumer Protection Act, Congress established an Office of Servicemember Affairs within the CFPB to coordinate with other federal and state agencies on consumer protection issues, as well as an ombudsman for student loans. These functions have provided the CFPB with unique insight into the student loan experience faced by military borrowers. Military borrowers provide input to the CFPB through town halls and

¹ National Center for Education Statistics: National Postsecondary Student Aid Study (2008).

² GAO-12-700 MORTGAGE FORECLOSURES: Regulatory Oversight of Compliance with Servicemembers Civil Relief Act Has Been Limited, July 2012.

forums, by submitting complaints and stories, and by contributing comments to official CFPB proceedings.

Because of the nature of military borrower concerns about student loans, the Office of Servicemember Affairs and the Office for Students, which houses the ombudsman, analyzed complaints, data, and program guidelines to identify some of the underlying issues faced by servicemembers.

BENEFITS FOR SERVICEMEMBERS WITH STUDENT LOANS

There is a complex array of benefits and special protections for active-duty servicemembers with student loans.

Loan Type	Option	Benefit	Requirements to Receive
Federal	Income-Based Repayment (IBR)	<ul style="list-style-type: none"> • Can reduce monthly payments based on income and family size • After 20-25 years of payments, remaining balance forgiven 	<ul style="list-style-type: none"> • Must apply and provide documentation to servicer • May need to “consolidate” older loans into a qualifying federal loan first
Federal	Public Service Loan Forgiveness (PSLF)	<ul style="list-style-type: none"> • Forgives any remaining balance after 120 “qualifying” monthly payments 	<ul style="list-style-type: none"> • Must maintain full-time employment with a “public service” employer when each payment is made • Must submit “certification of public service” to servicer • May need to “consolidate” older loans into a qualifying federal loan first
Federal	Annual Principal Reduction for Perkins Loans (Perkins)	<ul style="list-style-type: none"> • Reduces a portion of principal for each year of service 	<ul style="list-style-type: none"> • Must serve for 365 consecutive days in an “area of hostility” • Must apply and provide documentation to servicer
Federal and Private	Servicemembers Civil Relief Act (SCRA)	<ul style="list-style-type: none"> • Reduces interest rate to six percent during active-duty service on pre-service obligations 	<ul style="list-style-type: none"> • Must submit request in writing to servicer & provide copy of military orders calling onto active duty
Federal	Military Deferment	<ul style="list-style-type: none"> • Defers monthly payments during certain active duty service • Interest may accrue, depending on loan type 	<ul style="list-style-type: none"> • Must be serving on active duty or on full-time National Guard duty during a war/other military operation/national emergency • Must submit request to servicer
Private	Deferment and Forbearances	<ul style="list-style-type: none"> • Varies depending on lender • Does not suspend interest accrual 	<ul style="list-style-type: none"> • May vary depending on lender

SUMMARY OF ISSUES

While there is a range of benefits and protections for servicemembers, it is unclear whether student loan servicers are providing sufficient information for military borrowers to make the best decisions regarding the options and benefits available to them. Below we describe some of the key issues identified in complaints and other input provided to the CFPB.

Servicemembers are adopting less favorable repayment plans, which may lead to thousands of dollars in excess debt.

The CFPB has heard from servicemembers who contacted their student loan servicer for advice prior to their active-duty service. These individuals reported that, while they were vaguely aware of the “benefits” available to servicemembers on active duty, they relied heavily on their servicer to provide complete information about available options, including risks and benefits associated with each option. We have received complaints from servicemembers stating that they were guided into military deferments or forbearances and were unaware that upon the completion of their active-duty service their total loan debt would balloon due to the accumulation of unpaid interest.

Military deferment and forbearance can be costly over the long run. Deferment and forbearance eliminate the obligation to make monthly payments on a loan. However, if the loan is an unsubsidized federal loan or a private loan, then deferment and forbearance do not stop interest from accruing on the outstanding student loan debt or from capitalizing into the loan. We have heard from servicemembers who reported that they were not aware that interest accrued during this period.

A father of a servicemember stated: “[Our servicer] says there are 3 loans and that the original loans amounted to a little over \$61,000 when [my son] graduated. According to [our servicer,] the amount owed now is almost \$85,000. I have been told that the amount went up because [my son] did a 5 month deferral [sic] of payments some time back because of his military service.”³

It is important to note that while forbearance or deferment may provide short-term relief for borrowers experiencing extreme financial hardship, it is often not the best long-term solution for servicemembers. We considered a number of scenarios that servicemembers face to illustrate the significant savings that may be achieved when a military borrower has the necessary information to make informed decisions about his or her best loan repayment options.⁴

³ This report cites information from specific complaints submitted to the CFPB. In these cases, the consumers have provided consent to include the details of their complaints.

⁴ The scenarios assume that the servicemember borrows the maximum in available federal loans (subsidized and unsubsidized) and that he or she does not have any PLUS or Perkins loans. Additionally, the scenarios assume the borrower has private loans at a 12 percent interest rate that cannot be deferred; a family size of one; a 6-month grace period on all loans; and military pay scales based on the 2012 pay chart, starting at E-3 for enlisted and O-1 for officers.

A servicemember who enters the military with approximately \$80,000 in loans could save almost \$50,000 over the life of his loan, if he selects from the variety of protections and benefits available to him; instead of deferring his payments during his military service.⁵

Servicemembers should be able to trust that their servicer is providing complete and accurate information about all of the available options.

The CFPB heard from one borrower who stated that his loans were put into forbearance automatically, without an affirmative request and without his permission:

“I did not ask for my account to be placed in forbearance and as a result of this action, it is currently accumulating interest. To make matters worse, my account is accumulating interest at an incorrect and higher interest rate.”

Servicemembers have also stated that they were told they could not receive the SCRA six-percent interest-rate cap unless their loans were in forbearance or deferment.⁶

Alternatives to deferment and forbearance could help servicemembers save thousands on their student loans. While the promise of postponed payments can be attractive for some borrowers, these options may have significant costs. For federal student loans, Income-Based Repayment (IBR) is an alternative that could allow these servicemembers to reduce their monthly payments while ensuring that their overall debt doesn't balloon.

IBR sets a borrower's monthly payment at a fixed amount relative to income and family size. IBR allows servicemembers to make affordable monthly loan payments while still chipping away at their loan debt and limiting the increase in principal that comes with deferment and forbearance. For example, the scenario below demonstrates how a servicemember may reduce her monthly payment with IBR as an alternative to deferment.

⁵ This scenario assumes service on active duty for ten years. If this servicemember elects to defer the loans during his period of military service, the amount paid over the lifetime of the loans would be approximately \$128,923. If the servicemember utilizes the SCRA rate cap, enrolls in IBR, and qualifies for PSLF, he would instead pay approximately \$80,103, thereby saving an estimated \$48,820.

⁶ A recent class action, *Olson v. Citibank, et al.*, Case No. 10-cv-2992, filed in the United States District Court for the District of Minnesota, alleged that servicers were placing servicemembers into forbearance, without their affirmative request, when they invoked their SCRA rights. Some military borrowers may ultimately select deferment or forbearance as an option, particularly if they are able to participate in a non-Title IV repayment program that covers a portion of outstanding loan balances. Other repayment programs, however, are structured to refund amounts paid by the borrower. Therefore, deferment is not advisable for all repayment participants. Placing or advising all military borrowers to enter into deferment does not address the unique natures of these varied programs.

A servicemember who enters service with approximately \$14,000 in loans would have a standard monthly payment of \$157; but, by enrolling in IBR, she can reduce her payment by about \$67 per month. If she remains in service for 10 years, and makes 120 monthly on-time payments, she can take advantage of Public Service Loan Forgiveness. When combined with savings from the SCRA interest rate cap, she will save almost \$6,000 over the life of her loan.⁷

This repayment option has an added benefit—monthly payments made under IBR by an active-duty servicemember are “qualifying payments” under the Public Service Loan Forgiveness (PSLF) program.

Under the federal PSLF program, servicemembers who make 120 monthly on-time payments while on active duty (or while employed full-time in another eligible public-service position) will qualify to have any remaining federal student loan debt forgiven on their Direct Loans. The service during which time the qualifying monthly payments were made must have occurred on or after October 1, 2007. A servicemember entering service with a high student loan debt obtains a large benefit from enrolling in IBR and qualifying for PSLF.

A servicemember who takes out \$81,000 in loans for school will ultimately owe up to \$101,000 after his in-school deferment. If he elects to continue to defer his payments while serving on active duty, he will owe more than \$165,000 over the life of the loan. But if he enrolls in IBR, qualifies for PSLF and receives the benefit of the SCRA interest rate cap, he'll save almost \$55,000 over the life of the loan.⁸

Another example:

A servicemember who enters service with \$39,000 in loans he took out to pay for two years at a for-profit school will generally have a higher amount of private loans. Even with a higher percentage of private loans for which IBR and PSLF aren't available, the servicemember can still save over \$17,000 if he does not select deferment and instead enrolls in IBR and qualifies for PSLF for his federal student loans and receives his SCRA interest rate cap for all of his loans.⁹

⁷These numbers assume service on active duty for ten years. If this servicemember instead elects to defer the loans during his period of military service, he would pay \$21,308. If the servicemember utilizes the SCRA rate cap, enrolls in IBR and qualifies for PSLF, he would instead pay an estimated \$15,367, thereby savings an estimated \$5,941.

⁸This scenario assumes service on active duty for ten years. If this servicemember elects to defer the loans during his period of military service, he would pay \$165,165 over the life of the loan. If the servicemember utilizes SCRA rate cap, enrolls in IBR and qualifies for PSLF, he would instead pay approximately \$110,883, thereby saving an estimated \$54,282.

⁹This scenario assumes service on active duty for ten years. If this servicemember elects to defer the loans during his period of military service, he would pay \$64,605. If the servicemember utilizes SCRA rate cap, enrolls in IBR and qualifies for PSLF on the federal loans, he would instead pay approximately \$47,131, thereby saving an estimated \$17,474.

Servicemembers may face barriers when requesting and retaining protections afforded by the Servicemembers Civil Relief Act (SCRA).

The SCRA permits a servicemember to request an interest-rate reduction to six percent for financial obligations incurred prior to entry onto active duty.¹⁰ This protection has always applied to private student loans. The Higher Education and Opportunity Act of 2008 extended the protection to federal student loans.

To qualify for the protection, a servicemember must have entered into the financial obligation prior to entry onto active duty. She must send a written request to her servicer requesting the reduction along with a copy of her orders calling her onto active duty. This request may be submitted at any time during a servicemember's active service, and up to 180 days after completion of active duty. After receiving a valid request, the servicer must refund any interest charges in excess of the six-percent rate cap, dated from the servicemember's receipt of orders calling her onto active duty.¹¹ For example, if a servicemember received orders calling her onto active duty on February 15, 2009, to begin active duty on March 1, 2009, and she left active duty on March 1, 2012, the servicemember could request an interest reduction to six percent as late as September 1, 2012 and her servicer would be required to refund any interest charges paid above the six-percent rate cap subsequent to February 15, 2009.

The interest-rate reduction provided under the SCRA can be a valuable benefit for many servicemembers with student loans. For a servicemember with a large amount of private student loan debt, the savings from a SCRA interest-rate reduction can be tens of thousands of dollars. Although some of the benefits available to military borrowers on federal student loans are not applicable to private loans, **the SCRA interest rate cap applies to all student loans.** For some servicemembers, the SCRA rate cap may be the largest opportunity for savings:

The servicemember above with \$39,000 in loans who fails to obtain an SCRA interest rate cap may lose out on over \$12,000 in savings over a ten-year period.¹²

Many servicemembers navigate hurdles that may be unnecessary in order to receive the SCRA interest rate cap. Once a borrower has qualified for this interest-rate cap, the SCRA requires the servicer to continue to provide this benefit for the duration of the servicemember's time on active duty, as reflected in the servicemember's orders. We have received complaints from servicemembers, on active duty for multiple years, who reported that they were told that their interest-rate cap would expire annually, and were subsequently required to submit additional orders in order to retain this benefit.

A military borrower is not required to inform his servicer at regular intervals of the continuation of his active military service. Once a servicemember requests the SCRA interest-rate cap, the servicer should apply the benefit for the duration of active-duty status. The CFPB has heard

¹⁰ The SCRA states that the borrower's military service must have materially affected his ability to repay the debt. However, the burden is on the servicer to prove there was no material effect in order to validly deny the request. And establishing material effect is not merely whether a borrower's income was reduced upon entering military service; other factors, such as maintaining dual households, relocation, or other lifestyle changes may establish the requisite material effect. *See also Baxter v. Watson* (In re Watson), 292 B.R. 445 (S.D.Ga. 2003).

¹¹ Although the law puts the initial responsibility on the servicemember to provide proof of eligibility, specifically requiring the servicemember to provide "a copy of the military orders calling the servicemember to military service and any orders further extending military service," a servicer cannot impose additional requirements. 50 U.S.C. App. §527.

¹² See note 10.

from servicemembers who report that they were asked to provide orders that included an end-date for their active duty service:

“I received a letter from [my lender] stating they needed verification of my beginning and end dates of active service...Shortly thereafter, I sent them a letter stating that because I was a commissioned officer I did not have an end date, and I provided them with a copy of the DOD Manpower printout stating I was still on active duty. At the end of last month I received a letter stating that was not good enough, and that I needed to provide new orders or a letter from my commanding officer.”

The following quote is taken directly from a servicemember’s email to his loan servicer, requesting information on the status of his SCRA benefits. According to the servicemember’s complaint, he had been struggling to obtain reassurance that his SCRA rights had been provided to him for a number of years:

“Your reps are very unfamiliar with the difference between a reserve soldier that (receives orders to active duty status) compared to Active duty soldiers who can deploy anywhere in the world in 18hrs (who do not get these orders on your whim). We chose to serve our country in full active duty status in a time of war and don't appreciate the run-around that [your] customer service gives continually.”

Practices of this sort place an unnecessary burden on active duty servicemembers— particularly on officers whose orders do not typically contain an active-duty end date.

The Department of Defense maintains an online database that provides information regarding the active-duty status of individuals. Servicers have access to this database and can use a borrower’s name and Social Security number to verify a borrower’s current active-duty status. If a servicer would like annual information regarding a borrower’s active-duty status, this database should be utilized in lieu of placing the verification burden on the borrower, who may be deployed or otherwise occupied with military duties.

Servicing errors prevent servicemembers from accessing their full range of protections.

For many student loan borrowers, obtaining access to up-to-date information about their account status, payment history and loan terms can be challenging. The process for servicemembers seeking to verify if their service-specific benefits have been applied to their various loans can be particularly difficult. The CFPB has heard from a number of servicemembers who report that they struggled to get clear information from their servicer about the status of their loan and whether the SCRA interest-rate cap had been applied. According to the complaints received by the CFPB, of those military borrowers granted the interest-rate cap, the servicer typically did not provide evidence that the rate was being applied retroactively, as required by law. As a result, it is difficult for borrowers to evaluate the status of their benefits and determine whether their rights were being fully protected. The following complaint relays the frustration one military borrower experienced during his attempts to have the SCRA interest-rate cap applied to his loans:

“I have sent several recertification documents and military orders to reflect that I am still currently an Active Duty Soldier protected by this Federal Act. Since 2009, capitalized interest has been added to the loan at the interest rates of 11.25% and 8.75%. I am not even sure that the balance was adjusted the first time they complied in 2008. All of this interest has been over-charged since 2009, and they are refusing to adjust the balance. Over \$16,000 has been charged in capitalized interest at these higher rates.”

We have heard reports of some servicers using the SCRA to increase a servicemember’s interest rate. According to a complaint received by the CFPB, one borrower had six loans with a servicer, two of which had interest rates above six percent and four of which had interest rates below six percent. Instead of reducing the interest rate on the two higher-rate loans to six percent and leaving the four lower-rate loans untouched, the servicer simultaneously increased the interest rate on the lower-rate loans up to six percent.

Standards for awarding benefits are inconsistent and, as a result, may frequently be misapplied by servicers. Because the range of servicemember-specific benefits is created by a patchwork of different federal statutes and lender-specific policies, there are different eligibility requirements for receiving each benefit, and each benefit may not be available for every type of loan. For example, a servicemember who has a Perkins loan is eligible for principal reduction if he serves in “an area of hostility.” However, this requirement is unique to the Perkins loan benefit.

	Benefit	Type of Military Service Necessary to Receive Benefit
Federal	Public Service Loan Forgiveness	Any active-duty service under either Title 10 or Title 32 performed for ten years while making eligible payments, such as through IBR or according to a standard ten-year repayment plan.
	Principal Reduction for Perkins Loans	Must serve for 365 consecutive days in an “area of hostility.”
Federal or Private	Application of Six Percent Rate Cap	Must serve on active-duty service under either Title 10 or Title 32 (but if performed under Title 32 only if federally authorized), and the benefit can then be applied to all private and federal student loans accrued prior to service.
Federal	Military Deferment	Must be serving on active duty during a war or other military operation or national emergency or be performing qualifying National Guard duty during a war or other military operation or national emergency.
	Post Active Duty Deferment	Must be a member of the Reserve or National Guard of the U.S. Armed Forces and must have been called to active duty under either Title 10 or Title 32 status (but if performed under Title 32, service must have required relocation) while enrolled at least half-time in school or within six months of having been enrolled at least half-time.
Private	Alternative Repayment Plans	Requirements vary depending on the lender.

If a servicer conflates the requirements used for Perkins principal reduction with the requirements for SCRA protections, the servicer will likely incorrectly deny the benefit. By way of illustration, a servicemember who borrowed money to pay for college prior to entering the military would be entitled to request a rate reduction under the SCRA, by virtue of entering active duty with a pre-service obligation. Unlike the Perkins program, the SCRA does not require military service in any specific geographic location or “area of hostility” in order for a military borrower to receive this benefit. If servicers are misinformed about the eligibility requirements for the SCRA and other military benefits, they might tell servicemembers that they are only eligible for SCRA protections if serving in a combat zone. The result of the servicer’s misapplication of the law would be to deny a military borrower’s rightful benefits.

Current law may force servicemembers to forgo SCRA benefits in order to receive loan forgiveness. Despite the best efforts by borrowers and servicers to understand and navigate the complex set of options available to active-duty servicemembers, under current law servicemembers may be forced to choose between two benefits. Loan consolidation may lead to potential benefits under PSLF, but that same consolidation may simultaneously prevent a servicemember from retaining his SCRA interest-cap rights.

Before Congress simplified the process in 2010, a borrower could get a federal Stafford loan from one of two sources— through the U.S. Department of Education’s Direct Loan program or from a financial institution through the Federal Family Education Loan (FFEL) program. Many servicemembers still have older loans received through the FFEL program. In order for a borrower with these older loans to qualify for Public Service Loan Forgiveness (PSLF), he or she must borrow a new federal Direct Consolidation Loan—in effect, replacing his or her older loans with one new loan. A similar choice may be necessary if a borrower has a Perkins loan and wants to consolidate that loan into a Direct Consolidation loan in order to qualify for PSLF.

For most borrowers working in public service professions, the decision to consolidate is straightforward as they have no corresponding downside to consolidation. But the decision is more complex for servicemembers who may wish to take advantage of the SCRA interest-rate cap. The SCRA interest-rate cap is only available for loans that are “pre-service obligations.” But by consolidating loans that were obtained prior to active-duty service after one has entered onto active duty, those loans will change from pre-service obligations into post-service obligations, and thereby lose the SCRA protection. Replacing older, pre-service student loans with a new Direct Consolidation Loan will forfeit eligibility for the SCRA rate-reduction benefit, forcing some servicemembers to choose between a lower interest rate and the prospect of loan forgiveness. Servicemembers are forced to choose between these benefits because current law precludes many servicemembers from both obtaining the SCRA rate cap and qualifying for PSLF.

GUIDANCE FOR PROVIDERS OF ASSISTANCE TO MILITARY STUDENT LOAN BORROWERS

The CFPB is working on a number of fronts to help make the student loan market work better for servicemembers and their families. Working with the Department of Education, the CFPB launched a [Know Before You Owe](#) project to solicit input on a “financial aid shopping sheet.” The initiative should help students understand the debt implications of their college choice. Soon, all schools participating in the Department of Defense Tuition Assistance program will be required to use a “shopping sheet” modeled after this project.

The CFPB will offer a dynamic, web-based [Student Debt Repayment Assistant](#). This new web tool will help servicemembers better understand their student loan repayment options and make sense of the costs and risks that accompany each choice. And the CFPB began accepting private-

student loan complaints to help ensure that private student lenders and servicers are responsive to potential mistakes and problems that borrowers encounter. The CFPB will also partner with the military Judge Advocate Generals to provide up-to-date training on the various benefits available to servicemembers.

CONCLUSION

As this report demonstrates, federal law accords the military student loan borrower a number of consumer protections and unique benefits. These provisions recognize the importance of military service and the link between military readiness and financial readiness. Servicemembers who are concerned about financial problems and who must struggle to get complete information or assistance from their lenders will have difficulty focusing on their mission and accomplishing their critical national security role. It is therefore essential that military benefits and protections be known and understood by both borrower and lender, that information be easily accessible to this unique population, and that those who violate these basic protections be held accountable.

In order to create a student loan marketplace that works for military borrowers, all stakeholders must recognize the unique challenges and concerns military borrowers face. Student loan servicers must ensure strong compliance mechanisms and customer-service standards that work for the military, including the mobilized servicemember and the family member back at home. The CFPB, Department of Defense, and military service organizations must educate servicemembers about these unique rights and protections, empowering them to make well-informed financial decisions about the most beneficial repayment option for their student loans. And financial regulators and enforcement agencies must ensure that their policies and oversight mechanisms hold accountable those who violate these consumer protections.

The Consumer Financial Protection Bureau stands ready to work with all parties – to include government and industry – to ensure that servicemembers who sacrifice so greatly for our nation are not put at risk by improper practices in student loan servicing, similar to the ones we have already observed in the mortgage-loan industry.

Contact Information



TO REACH THE CFPB'S OFFICE FOR STUDENTS
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TO FILE A COMPLAINT

<http://www.consumerfinance.gov/complaint>

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