



Accounting for ACS's Failures

Error	Minimum # loans affected
Incorrect or missing counts of the number of payments borrowers had made toward PSLF	18,726
Applying forbearances inappropriately, often beyond the amount legally allowed, when borrowers could have been in IDR	2,822,802
Inaccurate payment amounts or terms for borrowers in income-driven repayment, possibly jeopardizing payments toward PSLF	81,187
Other IDR-related errors including putting borrowers with many loans in different payment plans (including plans ineligible for PSLF)	6,492
Problems related to setting due dates for loan payments, including assigning borrowers due dates in the past	103,244
Mistakes in calculating, tracking, or reporting borrowers' balances, possibly leading to errors in monthly payment calculations	36,970
Errors calculating borrowers' monthly payments, often leading to "balloon" payments at the end of the loan term	368,934
Faulty processing and recording of borrowers' payments, including ones that needed to be forwarded to borrowers' new servicers	6,627
Issues related to loan consolidation, including consolidating only some of a borrower's loans, possibly impacting PSLF eligibility	99
Using incorrect repayment schedules for borrowers' loans or simply not having one	1,097,789
Failing to transfer borrowers in forbearance or deferment to new servicers in the correct status	67,811
Applying the wrong interest rate or incorrectly applying an interest rate to borrowers' loans	14,581
Other billing errors, including making inaccurate disclosures in bills to borrowers	232,123
Transferring loans that should not have been transferred, including those owed by deceased borrowers	1,740
Transferring data with incorrect information or with borrower information missing, including data related to past bankruptcy settlements	114,589
Other errors cited without additional detail	66,765
Total	5,040,479