



October 2023

HIGHER EDUCATION

Options That May Help Survivors of Sexual Violence Continue Their Education and Manage Federal Student Loans

Why GAO Did This Study

According to research, domestic violence, dating violence, sexual assault, and stalking can have significant consequences on survivors. Survivors who were enrolled in college when the trauma occurred may experience both academic and financial consequences. The Consolidated Appropriations Act, 2022, includes a provision for GAO to review issues related to the impact of domestic violence, dating violence, sexual assault, or stalking on survivors' ability to continue their education and repay their federal student loans.

This report describes (1) policies and practices selected colleges have to help survivors continue their education and (2) repayment options that can help eligible survivors manage their federal student loans.

GAO reviewed documentation from Education and its loan servicers. GAO selected four colleges based on size (small, mid-size, and large), sector (public, private not-for-profit, private for-profit), program length (2-year and 4-year), and other factors. GAO also interviewed Education officials and 12 stakeholders, including administrators from the four colleges and representatives from eight organizations representing survivors, student loan borrowers, and colleges. GAO also reviewed relevant federal laws and regulations.

View [GAO-24-106282](#). For more information, contact Melissa Emrey-Arras at (617) 788-0534 or emreyarrasm@gao.gov.

HIGHER EDUCATION




Options That May Help Survivors of Sexual Violence Continue Their Education and Manage Federal Student Loans

What GAO Found

All four colleges GAO selected offered a mix of policies and practices to help address mental health, safety, and academic needs for survivors of domestic violence, dating violence, sexual assault, or stalking (see figure). Stakeholders GAO interviewed from the four colleges and eight organizations representing survivors, student loan borrowers, and colleges generally said these policies and practices can help survivors continue their college education.

- **Mental health needs.** All four colleges offered mental health services on campus or referrals to services off campus. Several stakeholders cited the importance of addressing survivors' mental health needs.
- **Safety needs.** All four colleges offered protective measures, such as no-contact orders and housing changes, to help survivors manage their interactions. Most stakeholders identified safety needs as a priority.
- **Academic needs.** All four colleges offered adjustments to courses, leaves of absence or withdrawals, and flexible transfer policies, which most stakeholders said can help survivors continue their education.

Examples of Policies and Practices to Help Survivors Continue Their College Education

 Mental health needs	 Safety needs	 Academic needs
<ul style="list-style-type: none"> • On-campus mental health counseling • Off-campus mental health referrals 	<ul style="list-style-type: none"> • No-contact orders • Campus escorts • Changes to housing assignments 	<ul style="list-style-type: none"> • Flexible GPA requirements for institutional scholarships • Extensions on assignments • Flexible grading • Withdrawal from courses • Withdrawal from school • Leave of absence • Transfer to a different school

Source: GAO analysis of interviews with and documentation from four selected colleges; GAO (icons). | GAO-24-106282

The Department of Education has several loan postponement and repayment options that can help survivors—and borrowers generally—manage their federal student loans. Eligible survivors can postpone making payments on their loans during the 6-month grace period after leaving college or dropping below half time, as well as during authorized deferment and forbearance periods. Borrowers may be able to reduce their monthly payments by enrolling in an Income-Driven Repayment (IDR) plan, which bases monthly payments on income and family size. Most stakeholders said that survivors could benefit from existing loan postponement and repayment options. GAO found each of the four loan servicers had procedures for guiding borrowers through them. Education and loan servicers said they prioritize IDR plans as a long-term solution for borrowers struggling to make payments. Payments on IDR plans may be as low as \$0 and count toward potential loan forgiveness at the end of the repayment period.

Contents

Letter		1
	Background	3
	Selected Colleges Have a Range of Policies and Practices to Help Survivors Continue Their Education	10
	Education Makes Available Several Options That Can Help Survivors Manage Their Federal Student Loans	15
	Agency Comments	20
Appendix I	GAO Contact and Staff Acknowledgments	21
Table		
	Table 1: Key Characteristics of Direct Loan Payment Postponement Options	8
Figures		
	Figure 1: Examples of Policies and Practices That Address Survivors' Mental Health, Safety, and Academic Needs	10
	Figure 2: Postponement and Repayment Options That Can Help Eligible Survivors Manage Their Federal Student Loans	15

Abbreviations

Clery Act	Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act
Direct Loan	William D. Ford Federal Direct Loan
IDR	Income-Driven Repayment
Title IX	Title IX of the Education Amendments of 1972
VAWA	Violence Against Women Reauthorization Act of 2013

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



October 26, 2023

The Honorable Bernard Sanders
Chair
The Honorable Bill Cassidy
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Virginia Foxx
Chairwoman
The Honorable Robert C. “Bobby” Scott
Ranking Member
Committee on Education and the Workforce
House of Representatives

According to research, domestic violence, dating violence, sexual assault, and stalking can have significant consequences on survivors. Survivors who were enrolled in college when the trauma occurred may experience both academic and financial consequences.¹ For example, research indicates that survivors may experience declines in their academic performance and may need to take time away from college. Further, as a result of their trauma, survivors may struggle to take advantage of career opportunities after college, which can lead to difficulties repaying their federal student loans.

These circumstances have raised questions about what academic and federal student loan options are available to survivors. The Consolidated Appropriations Act, 2022, includes a provision for GAO to examine issues related to the impact of domestic violence, dating violence, sexual assault, or stalking on survivors’ ability to continue their education and repay their federal student loans.

This report describes (1) policies and practices selected colleges have to help survivors continue their education, and (2) repayment options that can help eligible survivors manage their federal student loans.

To address both objectives, we interviewed Education officials and 12 stakeholders with relevant expertise, including representatives from eight

¹In this report, we use the term “college” to refer to all types of institutions of higher education that participate in federal student aid programs authorized under Title IV of the Higher Education Act of 1965, as amended. The term “institution of higher education” for purposes of student assistance programs is defined at 20 U.S.C. § 1002.

organizations representing colleges, survivors, and student loan borrowers, and administrators from four colleges.² These stakeholders' views are not generalizable, but offer a range of perspectives about survivors' needs, how colleges can address them, and options for managing survivors' federal student loan debt. We also reviewed relevant federal laws and regulations, and literature on how domestic violence, dating violence, sexual assault, or stalking affects survivors.

To select colleges, we analyzed fall 2021 data from Education's Integrated Postsecondary Education Data System on the characteristics of colleges to develop an initial list of colleges that participate in federal student aid programs. Specifically, we grouped colleges into categories by program length and sector (i.e., 2-year public, 4-year public, 4-year private not-for-profit, and 4-year private for-profit) and randomized the list. To select specific colleges, we started with the first college in each category of the randomized list and contacted administrators at each of these colleges to schedule interviews. We selected four colleges to obtain variation in size, sector, and program length.³ We also considered whether the colleges were located in a state with credit transfer articulation agreements, according to a nonpartisan organization that tracks information on state education policies.⁴

To better understand selected colleges' policies and practices regarding retention and transfer for survivors, we also reviewed relevant documentation for the four selected colleges, including their annual security reports outlining the supports and protective measures available to survivors, and written policies related to withdrawal and transfer.

²We refer to representatives of these organizations and entities collectively as "stakeholders" in our report. When discussing stakeholder views, we group them into the following categories: "several" (between three and five), and "most" (between seven and 10).

³For variation in size, we grouped colleges into three categories: small (enrollment of 4,999 or fewer students), mid-size (enrollment between 5,000 and 19,999 students), and large (enrollment of 20,000 or more students).

⁴Credit transfer articulation agreements generally allow credits to transfer between colleges that have entered into such agreements provided certain requirements, such as grade requirements, are met. While agreements are often between public colleges within a state college system, private colleges are able to enter into these agreements as well. In order to identify statewide credit transfer and articulation agreements, we leveraged existing research by a nonpartisan organization that tracks information on state education policies. Education Commission of the States, *50-State Comparison: Transfer and Articulation* (July 2022), accessed on February 2, 2023, <https://reports.ecs.org/comparisons/transfer-and-articulation-2022>. We did not conduct an independent legal review to identify relevant state laws, regulations, or policies.

To better understand the options Education makes available for postponing federal student loan repayment, we reviewed documentary evidence from Education and its loan servicers on the following options for postponing loan repayment: (1) grace periods, (2) deferment, and (3) forbearance.⁵ We compared these options to an option for managing student loan debt, namely Income-Driven Repayment (IDR) plans. We reviewed documentation from Education and servicers related to these options, such as guidance, training materials, and call scripts.

We conducted this performance audit from October 2022 to October 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Incidence of Sexual Violence in Colleges and Its Long-term Effects

Measuring the prevalence of domestic violence, dating violence, sexual assault, and stalking on college campuses has proven difficult—due in part to underreporting of these incidents to law enforcement. Additionally, estimates from surveys that gather such information can vary widely in their definitions and findings.⁶ However, despite varying estimates of the prevalence of sexual violence on college campuses, it is widely acknowledged as a problem.⁷ For example, a widely cited campus

⁵At the time of our review, Education was in the process of consolidating loan servicers. We included in our review the four servicers that Education had expected to continue servicing loans when the COVID-19 payment pause ended and student loan repayment restarted: AidVantage, EdFinancial, Missouri Higher Education Loan Authority, and Nelnet.

⁶Lisa Fedina, Jennifer Lynne Holmes, and Bethany Backes, “How Prevalent Is Campus Sexual Assault in the United States?” *National Institute of Justice, Department of Justice, National Institute of Justice Journal* vol. 277 (2016): 26-30.

⁷For the purposes of this report, we use the term “sexual violence” to refer to the broad range of unwanted sexual acts on which federal agencies collect information, including domestic violence, dating violence, sexual assault, and stalking. In cases where documentation we reviewed or stakeholders we interviewed used different definitions, terminology, or focused more narrowly on a subject of sexual violence, we used the term they used. According to the Centers for Disease Control and Prevention, there is no consensus regarding the definition of sexual violence and how its various components (e.g., penetrative acts, coercion, sexual harassment, non-contact acts) should be measured. Department of Health and Human Services, Centers for Disease Control and Prevention, *Sexual Violence Surveillance: Uniform Definitions and Recommended Data Elements, Version 2.0* (Atlanta, Ga.: 2014).

climate survey conducted in 2019 found that, among undergraduate students, 26.4 percent of women and 6.9 percent of men experienced sexual assault through physical force or an inability to consent.⁸ Another study found stalking to be prevalent among college students, with 42.5 percent of 1,573 students polled in an online survey reporting at least one indicator of stalking victimization.⁹ Research has also shown that survivors of sexual violence are more likely to drop out of college and suffer from lower GPAs.¹⁰ Additionally, a survey of 435 female college students found that intimate partner violence was correlated with economic hardship and abuse, depression, and post-traumatic stress disorder.¹¹

The long-term negative financial effects of sexual violence can be pervasive, with one 2017 study estimating that the lifetime cost of rape was \$122,461 per survivor, including medical costs, lost productivity, criminal justice activities, and other costs.¹² Negative career outcomes, which can influence future earning potential, have also been observed by researchers. For example, two small-scale surveys found that survivors reported derailed education and career goals, with 69.5 percent of those

⁸David Cantor, Bonnie Fisher, Susan Chibnall, Shauna Harps, Reanna Townsend, et. al., *Report on the AAU Campus Climate Survey on Sexual Assault and Misconduct* (Association of American Universities, January 17, 2020). Campus climate surveys on sexual violence are designed to collect information on the incidence and characteristics of sexual violence on college campuses, as well as related student attitudes and behaviors.

⁹Corinne L. McNamara and Dorothy F Marsil, "The prevalence of stalking among college students: the disparity between researcher- and self-identified victimization," *Journal of American College Health*, J of ACH vol. 60 no. 2 (2012): 168-74.

¹⁰T.D. Molstad, J.M. Weinhardt, R. Jones, *Sexual Assault as a Contributor to Academic Outcomes in University: A Systematic Review. Trauma Violence Abuse*, vol. 24, no. 1 (January 2023): 218-230.

¹¹Rachel J. Voth Schrag, Sarah R. Robinson, and Kristen Ravi, "Understanding Pathways within Intimate Partner Violence: Economic Abuse, Economic Hardship, and Mental Health," *Journal of Aggression, Maltreatment & Trauma*, vol. 28, no. 2 (2019): 222-242. According to the Centers for Disease Control and Prevention, intimate partner violence includes physical violence, sexual violence, stalking, and psychological aggression (including coercive tactics) by a current or former intimate partner. An intimate partner refers to a spouse, boyfriend, girlfriend, dating partner, or ongoing sexual partner. Department of Health and Human Services, Centers for Disease Control and Prevention, *Intimate Partner Violence Surveillance: Uniform Definitions and Recommended Data Elements, Version 2.0* (Atlanta, Ga.: 2015).

¹²Cora Peterson et al., "Lifetime Economic Burden of Rape Among U.S. Adults," *American Journal of Preventative Medicine* (June 2017): 691-701.

surveyed in one of these surveys attributing at least one negative academic or career outcome to the sexual assault.¹³

Federal Efforts to Address Sexual Violence in Higher Education

The Violence Against Women Reauthorization Act of 2013 (VAWA) amended the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) to require colleges to develop and distribute a statement of policy addressing, among other things, written notification to students about existing counseling, health, mental health, victim advocacy, legal assistance, and other services available for survivors both on-campus and in the community. Additionally, colleges must provide any student who reports that they have been a victim of domestic violence, dating violence, sexual assault, or stalking with a written explanation of a student's rights and options, regardless of whether the offense occurred on campus. VAWA also amended the Clery Act to require that colleges include statistics concerning the occurrence of certain domestic violence, dating violence, sexual assault, and stalking incidents in their annual security reports. Also, VAWA was reauthorized in 2022 and introduced several additional efforts to address sexual violence on college campuses, including providing more funding for college sexual assault prevention efforts and establishing a new interagency task force on sexual violence in education led by the Secretary of Education, the Secretary of Health and Human Services, and the Attorney General.

Moreover, Title IX of the Education Amendments of 1972 (Title IX) prohibits sex discrimination in education programs or activities that receive federal financial assistance, including colleges. Under Education's current regulations, sex discrimination includes discrimination in the form of sexual harassment, which is defined to include, among other things, sexual assault, dating violence, domestic violence, and stalking.¹⁴ Additionally, under Education's regulations, colleges receiving federal financial assistance from Education must adopt and publish procedures for resolving Title IX complaints and designate at least one employee to coordinate compliance efforts.¹⁵

¹³Sharyn J. Potter, Elizabeth A. Moschella, Elizabeth A. Mumford, and Bruce G. Taylor, "Outcomes of Sexual Assault Victimization in Early Adulthood: National Estimates for University and Nonuniversity Students," *Journal of Interpersonal Violence* 37 (2022). See also Sharyn Potter, Rebecca Howard, Sharon Murphy, and Mary M. Moynihan, "Long-term impacts of college sexual assaults on women survivors' educational and career attainments," *Journal of American College Health*, 66:6 (2018): 496-507.

¹⁴34 C.F.R. § 106.30. In July 2022, Education published a Notice of Proposed Rulemaking that would amend Education's regulations implementing Title IX. Education anticipates publishing the Final Rule in October 2023.

¹⁵34 C.F.R. § 106.8.

College Credit Transfers

Students may opt to transfer from one college to another in response to changing needs or circumstances. A student who wants to transfer credits generally must provide the destination college with a transcript of previously earned credit. Destination colleges generally have discretion in determining whether to accept these credits, and any loss of credits affects a student's progress and costs in earning a degree.

Many colleges enter into voluntary transfer agreements or partnerships with each other—broadly referred to as articulation agreements—that specify how transferred course credits meet program or degree requirements among those colleges. In addition, states can establish statewide articulation agreements as well as credit transfer policies that are generally applicable within the state. Under federal law, colleges participating in federal student aid programs are required to publicly disclose their transfer of credit policies, including a list of colleges with which they have articulation agreements.¹⁶

Direct Loan Program and Repayment Options

Education administers the William D. Ford Federal Direct Loan (Direct Loan) program through the Office of Federal Student Aid. Education issues several types of loans under the Direct Loan program, including subsidized and unsubsidized loans, to help students and their parents pay for postsecondary education.

After a prospective borrower applies for and is awarded a Direct Loan, Education then disburses the loan through the borrower's college. Upon disbursement of funds, Education assigns each loan to a contracted loan servicer responsible for communicating information to borrowers about the status of their loans, providing information about and enrolling borrowers in repayment plans, and processing payments. Borrowers are not required to make loan payments when they are enrolled in college at least half-time or during the "grace period"—usually 6 months after leaving college or dropping below half-time enrollment. Once borrowers enter repayment, they make payments directly to their assigned servicer.

A variety of repayment plans are available to eligible Direct Loan borrowers, including Standard, Graduated, Extended, and several IDR plans. Borrowers are automatically enrolled in the Standard plan if they do not choose another repayment option, and they generally owe fixed

¹⁶20 U.S.C § 1092(h)(1).

monthly payments over a period of 10 years.¹⁷ However, borrowers can generally change repayment plans at any time.

IDR plans can ease repayment by setting monthly loan payments based on a borrower's income and family size and extending the repayment period up to 20 or 25 years, depending on the plan.¹⁸ Also, unlike Standard, Graduated, and Extended repayment plans, which require the loan to be repaid in full, IDR plans offer forgiveness of the loan's balance at the end of the repayment period and monthly payments may be as low as \$0 for some borrowers.¹⁹

In addition to different repayment plan options, borrowers may also temporarily postpone making loan payments through deferment or forbearance. Several different types of deferment are currently available to borrowers, each with their own eligibility criteria (see table 1).²⁰ Under deferment, the interest generally does not accrue on subsidized loans, but it continues to accrue on unsubsidized loans. Eligible borrowers can also postpone or reduce loan payments through either a general or mandatory forbearance; however, interest on the loan continues to accrue

¹⁷Terms for other repayment plans vary, depending on the type of loan and when the loan entered repayment. Under the Graduated plan, for loans entering repayment on or after July 1, 2006, borrowers have a fixed repayment term of up to 10 years (or 10 to 30 years for Consolidation loans) and monthly payments gradually increase over time. Under the Extended plan, for loans entering repayment on or after July 1, 2006, borrowers' terms are fixed at 25 years or less. Monthly payments under this plan may be fixed or graduated, and borrowers must have more than \$30,000 in loans to qualify. Monthly payment amounts under the Standard, Graduated, and Extended repayment plans are not based on income.

¹⁸IDR includes the following plans: Income-Contingent Repayment, Income-Based Repayment, Pay As You Earn, and Saving on a Valuable Education, formerly known as Revised Pay As You Earn plan. In July 2023, Education published final regulations governing IDR plans by amending the Revised Pay as You Earn plan and restructuring and renaming the repayment plan regulations under the Direct Loan Program. While the effective date of the final regulations is July 1, 2024, the Secretary designated certain regulatory changes for early implementation beginning on July 30, 2023. 88 Fed. Reg. 43,820 (July 10, 2023).

¹⁹Generally, outstanding student loan balances forgiven through IDR forgiveness are subject to federal taxation. However, the American Rescue Plan Act of 2021 enacted in March 2021 temporarily excluded most student loan forgiveness, including IDR forgiveness, received in 2021 through 2025 from gross income for purposes of federal taxation. Pub. L. No. 117-2, § 9675, 135 Stat. 4, 185-86.

²⁰An in-school deferment, available to eligible borrowers who are pursuing additional higher education, is the most commonly used type of deferment.

in each type.²¹ Unlike most types of mandatory forbearance and deferment, a general forbearance can be issued over the phone with no supporting documentation.²²

Table 1: Key Characteristics of Direct Loan Payment Postponement Options

	Deferment	General forbearance	Mandatory forbearance
What are the eligibility criteria? ^a	Must be granted if borrowers meet the eligibility requirements, such as being enrolled in school at least half-time, in certain active-duty military service, or unemployed.	None; eligibility is granted at the discretion of the loan servicer and may be based on any reason acceptable to the loan servicer, such as borrowers' financial difficulties.	Must be granted by the loan servicer if borrowers meet the eligibility requirements, such as serving in certain medical or dental residency programs, AmeriCorps, or if the total monthly payment borrowers owe for all their federal student loans is 20 percent or more of their total monthly gross income.
How long can the borrower remain in status?	For most deferment types, eligibility can be renewed as long as borrowers continue to meet the eligibility requirements. ^b	Borrowers can remain in forbearance for up to 12 months before they have to reapply. Under Education policy, there are no limits on the total amount of time borrowers can spend in general forbearance as long as they do not exceed 36 consecutive months in general forbearance. ^c	For most mandatory forbearance types, eligibility can be renewed as long as the borrower continues to meet the eligibility requirements. ^b
Is supporting documentation required?	Yes; supporting documentation is generally required. ^d	No; borrowers can attest to their need over the phone with no supporting documentation.	Yes; supporting documentation is generally required. ^d
Does interest continue to accrue?	Interest does not accrue on subsidized loans, but it continues to accrue on unsubsidized loans.	Yes.	Generally yes.

Source: GAO analysis of relevant federal laws, regulations, and Department of Education guidance. | GAO-24-106282

^aEligibility is assessed once the borrower requests a general forbearance, mandatory forbearance, or deferment.

²¹For subsidized loans, which are available only to undergraduate students, borrowers are generally not responsible for paying interest on the loans while in school, during the 6-month grace period, and during periods of authorized deferment. During deferment, borrowers can temporarily suspend repayment, if for example, they pursue additional higher education, provide military service, or experience economic hardship. For unsubsidized loans, which are available to undergraduate and graduate students, borrowers are responsible for all interest charges.

²²Several different types of mandatory forbearance are available. For example, borrowers participating in certain teaching services or serving in certain medical or dental residency programs, AmeriCorps, or the National Guard are eligible for mandatory forbearance.

^bEligibility for deferment based on unemployment or economic hardship and eligibility for mandatory forbearance based on student loan debt burden is generally capped at 3 years.

^cIf they choose to do so, loan servicers may set a limit below 12 months for the maximum period of time they grant for each general forbearance.

^dThe supporting documentation required differs depending on the type of mandatory forbearance or deferment. For example, a mandatory forbearance based on burden of student loan debt requires submission of income documentation, such as a tax return. Loan servicers may be able to verify eligibility through Education's central database for federal student aid information with no additional documentation provided by borrowers for some types of mandatory forbearance and deferment, according to Education officials. Additionally, some borrowers who qualify for unemployment deferment can attest to their need with no supporting documentation.

In response to the COVID-19 pandemic, Education implemented student loan relief for borrowers under the CARES Act and related administrative actions that, starting in March 2020, suspended loan payments, accrual of interest, and involuntary collections on defaulted loans for most federal student loans.²³ This COVID-19 emergency relief for student loans was extended several times through administrative actions, and the Fiscal Responsibility Act of 2023 required this emergency relief to end on August 30, 2023.²⁴ Although borrowers were not required to make payments during the COVID-19 emergency relief period, the months covered under the relief period count toward loan forgiveness and loan rehabilitation.²⁵

²³The CARES Act was enacted on March 27, 2020. See Pub. L. No. 116-136, § 3513, 134 Stat. 281, 404-05 (2020). Education implemented this COVID-19 emergency relief for federal student loans retroactive to March 13, 2020, the date COVID-19 was declared a national emergency. Involuntary collections may include wage garnishments and offsets of tax refunds or federal benefit payments.

²⁴Pub. L. No. 118-5, § 271, 137 Stat. 10, 33-34.

²⁵Unlike other periods of forbearance, interest did not accrue on the loans during this period and the months without payments count as qualifying payments towards IDR forgiveness. Loan rehabilitation is an option for resolving defaulted federal student loans, which allows borrowers who make nine on-time monthly payments within 10 months to have the default removed from their credit reports. Borrowers may rehabilitate a loan only once. During the COVID-19 emergency relief period, borrowers who have entered into a rehabilitation agreement could get credit toward rehabilitating their loans (for each month after the start of the rehabilitation agreement) even without making a payment.

Selected Colleges Have a Range of Policies and Practices to Help Survivors Continue Their Education

The four selected colleges implemented a mix of policies and practices to help address survivors' mental health, safety, and academic needs. Stakeholders we spoke with said such policies and practices could help survivors continue their education at the same or another college and are generally administered by Title IX offices (see fig. 1).

Figure 1: Examples of Policies and Practices That Address Survivors' Mental Health, Safety, and Academic Needs



Source: GAO analysis of interviews with and documentation from four selected colleges; GAO (icons). | GAO-24-106282

Mental Health Needs

The four selected colleges offered mental health services or referrals. According to administrators we spoke with, three of the colleges offered on-campus mental health counseling services to survivors and one provided referrals to such services in the community.²⁶ For example, administrators at a 2-year public college stated that they offered survivors free, on-campus mental health counseling. They also said the college provided students with access to a health center that could prescribe medications for an out-of-pocket cost ranging from \$0 to \$10. Administrators from a 4-year private for-profit college said they provide mental health referrals to nonprofit community-based organizations in the survivor's community.

²⁶Administrators from one of the colleges that offered on-campus mental health services said they also provided referrals to off-campus mental health services to survivors who needed additional care.

Several stakeholders cited the importance of policies and practices to address the mental health needs of survivors and had mixed opinions on the availability of mental health services for survivors. Two stakeholders cited access to mental health services as a potential challenge for survivors at some colleges due to long waitlists and shortages of mental health professionals.²⁷ However, two other stakeholders cited examples of colleges offering robust mental health services at low-to-no cost to survivors.

Safety Needs

No-contact Orders

A no-contact order is an administrative measure that colleges can take to ensure that students identified in a Title IX complaint have no contact with one another. These no-contact orders are issued by colleges, not civil or criminal courts, and may prohibit individual, telephone, electronic or third-party communications between the parties involved. These no-contact orders may also modify course schedules, work schedules, and housing assignments, along with access to parts of campus. Violations of these no-contact orders may lead to disciplinary measures by a college.

Source: GAO analysis of information from stakeholders and Department of Education regulations. | GAO-24-106282

All of our selected colleges offered protective measures to address the safety needs of survivors, including no-contact orders; assistance with notifying law enforcement; and modifications to college housing, employment assignments, and transportation arrangements. Officials at all of the colleges shared that escorts are provided to survivors who request one.

Most stakeholders we spoke with identified policies and practices that address the safety needs of survivors attending college as a priority. According to one stakeholder, no-contact orders can be a helpful protective measure for survivors, as the orders are generally easily obtained and can limit contact and communication between a survivor and perpetrator. However, this stakeholder also observed that no-contact orders may not be effective in cases of stalking. Another stakeholder shared an example of a survivor who moved into on-campus housing because the no-contact order that was in place did not apply to off-campus living situations.

Academic Needs

All of our selected colleges had policies and practices to help address academic needs, including course adjustments, leaves of absence or withdrawals, and transfers. Most stakeholders said these types of policies and practices can help survivors continue their education.

Course adjustments. The four selected colleges offered a variety of course adjustments, such as flexible grading, extensions on assignments, and remote courses. Administrators told us Title IX offices at the colleges were generally responsible for coordinating course adjustments for survivors, and that they tailored specific adjustments based on a survivor's individual needs. For example, at two colleges, survivors

²⁷GAO previously reported on shortages of qualified behavioral health professionals. For example, in 2022 GAO reported that, as of September 30, 2020, the Health Resources and Services Administration designated more than 5,700 mental health provider shortage areas across the U.S., with more than one-third of Americans (119 million people) living in these shortage areas. See GAO, *Mental Health Care: Access Challenges for Covered Consumers and Relevant Federal Efforts*, [GAO-22-104597](#) (Washington, D.C.: Mar. 29, 2022).

seeking academic support could take an “incomplete” with the opportunity to complete course requirements later, rather than risking a low grade. An administrator from another college observed that remote course offerings, which have become more widely available since the COVID-19 pandemic, can be a helpful option to survivors who may not feel comfortable on campus but still want to continue their education.

Several stakeholders explained how GPA requirements and other academic policies could affect survivors who rely on institutional scholarships. Several stakeholders said that, in their view, colleges should waive scholarship GPA requirements for survivors of sexual violence. Administrators at a 4-year public college said they reduced the cumulative GPA all students must maintain to remain eligible for merit scholarships from 3.5 to 2.0. They said the college found that a higher GPA requirement placed an undue burden on students and did not take into account extenuating circumstances that can have a negative effect on retention. Administrators from a 2-year public college and a 4-year private not-for-profit college shared that they have an appeals process for students who are unable to meet institutional aid requirements due to an extenuating circumstance.

Leaves of absence and withdrawal. All of our selected colleges had policies and practices that allow survivors to take time off from their education or reduce their course load. Several stakeholders said these types of policies and practices can help survivors who are struggling academically to recover and continue their education. Administrators from one college observed that survivors may feel torn between taking time off and continuing their education. They said survivors may ask themselves how they can maintain their course load while also dealing with trauma, knowing that taking time off could delay their graduation date. Another stakeholder shared that some survivors may choose to take time off as a result of not being offered robust accommodations by their colleges. According to this stakeholder, a “hands-off” approach toward supporting survivors can lead them to falling behind their peers.

- *Leaves of absence.* Three of our selected colleges offered leaves of absence to survivors.²⁸ For example, one college, which operates on a quarter-term system, had a policy that allowed leaves of absence for up to two quarters (about 6 months) with a waived documentation requirement for survivors, according to administrators.

²⁸Federal regulations permit colleges to approve leaves of absence for up to 180 days in a 12-month period, provided certain conditions are met.

-
- *Withdrawal.* All of our selected colleges offered withdrawal options to survivors, and included written information on withdrawal procedures and deadlines on their websites. Withdrawal options included withdrawing from the college completely or withdrawing from one or more courses. For students withdrawing from college completely, our selected colleges either required students to submit a withdrawal form that requests basic information, or allowed students to notify college administrators verbally. Administrators from each of the colleges confirmed that withdrawing from courses would not affect a student's cumulative GPA but would usually appear on the student's transcript. To mitigate potential negative effects on survivors, administrators from three colleges said that, in certain circumstances, Title IX coordinators may allow survivors to withdraw from courses without the record appearing on their transcripts.

All of our selected colleges published tuition refund policies on their websites, along with information about the potential financial consequences of withdrawing from college or from courses, including potential changes in financial aid awards. Several stakeholders said that survivors could benefit from greater flexibility regarding tuition refunds after withdrawing from courses due to sexual violence. The tuition refund policies at our selected colleges varied. For example, administrators from a 2-year public college and a 4-year private not-for-profit college we interviewed said that survivors who withdraw would have an opportunity to appeal for a tuition refund due to extenuating circumstances, which could include sexual violence. At the 4-year public college included in our review, tuition refunds for students who withdraw are prorated and based on the date that a student last attended class.

Transfer policies. All of our selected colleges provided information on their websites about transfer, including information on admissions requirements, considerations for what credits they accept, and credit transfer articulation agreements they have with other colleges. When evaluating which credits to accept, three of the colleges generally looked for courses that were comparable to courses being offered at their colleges and a minimum grade of "C" or "C-." Three colleges required transfer credits to come from a regionally accredited college, which one

stakeholder said can be a barrier for students attending private for-profit colleges.²⁹

Several stakeholders said it is important for survivors to be able to transfer colleges easily due to safety concerns or trauma, as either can negatively affect survivors' grades or their ability to continue their education. Survivors who wish to transfer to a new college generally would be subject to the new college's transfer admission requirements for all students, according to most stakeholders. Administrators at all of our selected colleges said they would not know whether a transfer applicant is a survivor in most circumstances because such information is not included in records provided by the former college. However, administrators from one college told us that they consider extenuating circumstances of students who apply to transfer, adding that survivors could choose to explain issues such as gaps in completed coursework or poor grades. Administrators at a 2-year public college told us they would not need to consider extenuating circumstances for transfer students due to the college's open admissions policy.

Several stakeholders said survivors trying to transfer credit to a different college may face challenges, as colleges have discretion when deciding whether to award credit to transfer applicants for prior coursework. One stakeholder added that survivors who transfer colleges after an extended absence from their studies may experience particular difficulties. In 2017, we found credit loss can be a significant challenge to students pursuing transfer, and that more complete information on colleges' articulation agreements can help students avoid making uninformed transfer decisions that could add to the time and expense of earning a degree.³⁰

Based on these findings, we made two recommendations to Education to improve students' access to transfer information. Education concurred with and implemented one of these recommendations by adding general transfer information to its StudentAid.gov website on topics such as how to determine whether course credits will transfer, articulation agreements, and financial aid considerations associated with transfer. Education initially disagreed with our recommendation to require or encourage colleges to disclose information on their websites regarding articulation

²⁹The fourth selected college accepts transfer credit from both regionally and nationally accredited colleges. We previously reported that private for-profit colleges are typically nationally accredited, whereas public and private not-for-profit colleges are historically regionally accredited. See GAO, *Higher Education: Students Need More Information to Help Reduce Challenges in Transferring College Credits*, [GAO-17-574](#) (Washington, D.C.: Aug. 14, 2017).

³⁰[GAO-17-574](#).




agreements with other colleges. However, Education subsequently implemented this recommendation by updating its 2022–2023 Federal Student Aid handbook to encourage colleges to publicly disclose information on their websites regarding the articulation agreements they have with other colleges. We believe this update will help encourage colleges to more clearly inform students about transfer options.

Education Makes Available Several Options That Can Help Survivors Manage Their Federal Student Loans


Education makes available several loan postponement and repayment options that can help eligible survivors manage their federal student loans, including grace periods, deferment, forbearance, and IDR plans (see fig. 2). These options are available to eligible borrowers generally and are not just for survivors. Education officials said that loan servicers have been directed to assist borrowers experiencing difficulties making their monthly student loan payments for whatever reason. Most stakeholders said that survivors could generally benefit from existing loan postponement and repayment programs.

Figure 2: Postponement and Repayment Options That Can Help Eligible Survivors Manage Their Federal Student Loans

Postponement: Ways to Delay Repayment

<p>Grace period</p> 	<ul style="list-style-type: none"> • Repayment generally not required for 6 months after graduating, withdrawing, or dropping below half time. • Borrowers who reenroll in college at least half-time before the end of the grace period, will have the full 6-month grace period when they stop attending or drop below half-time enrollment again. • Interest generally does not accrue on subsidized loans but it continues to accrue on unsubsidized loans.
<p>Deferment</p> 	<ul style="list-style-type: none"> • Available to borrowers who meet certain eligibility requirements, such as being enrolled in college at least half-time; having income below a certain level; qualifying for federal means-tested benefits such as Temporary Assistance for Needy Families; or being unemployed. • Interest generally does not accrue on subsidized loans but it continues to accrue on unsubsidized loans.
<p>Forbearance</p> 	<ul style="list-style-type: none"> • Borrowers may qualify for a mandatory forbearance if they meet certain eligibility requirements, such as if the total payment they owe each month for all their federal student loans is 20 percent or more of their total monthly gross income. • Other borrowers experiencing financial difficulties may be eligible for general forbearance, which can be issued over the phone with no supporting documentation.

Income Driven Repayment (IDR) plans

<p>IDR</p> 	<ul style="list-style-type: none"> • Extends repayment from 10 years under the Standard Plan to up to 20 or 25 years, and monthly payments are based on borrower income and family size. • Unlike Standard and other repayment plans, which require the loan to be repaid in full, IDR plans offer forgiveness of the loan's balance at the end of the repayment period. • Monthly payments can be as low as \$0 for some borrowers and still count toward forgiveness. • Once on an IDR plan, borrowers generally must recertify their income and family size annually. They can also request their monthly payment amount be recalculated at any time due to changes in income or family size.
--	--

Source: GAO analysis of Department of Education information; GAO (icons). | GAO-24-106282

Servicer Protections for Borrower Privacy

Each of the four loan servicers has protocols to protect information they collect from borrowers. Several stakeholders said that some survivors still may have concerns about keeping personally identifiable information private. Recognizing that some borrowers may want additional safeguards, loan servicers have other options to further protect personal information.

- Three servicers give borrowers the option to create a security password to further restrict access to information, which one servicer noted could be helpful for borrowers whose personal information could be known by a stalker or abuser.
- Another servicer has an address confidentiality program for borrowers who are concerned about their safety. This servicer's guidance states that program participants are typically survivors of domestic violence, stalking, sexual assault, or human trafficking.

Source: GAO analysis of interviews and loan servicer documentation. | GAO-24-106282

We found each of the four loan servicers included in our review has procedures for guiding borrowers, including survivors, through the available options. The procedures contain questions about the difficulties borrowers are facing to help determine what options they are eligible for and what will meet their needs. Both Education and the loan servicers prioritize IDR plans as a long-term solution for borrowers struggling to make payments. Education officials and the loan servicers also said that if IDR is not sufficient to meet a borrower's needs, the borrower can pursue another option to postpone loan payments temporarily.³¹

Postponement options. Survivors—like all borrowers—may qualify for several options to temporarily postpone loan payments:

- *Grace periods.* As noted earlier, undergraduate borrowers with Direct Loans are generally not required to make loan payments during the standard 6-month grace period after dropping below half-time enrollment, graduating, or leaving college.³² This grace period may help survivors who need to take time off from college to recover from sexual violence, according to several stakeholders. Education also has policies in place that provide some protections for borrowers who have gaps in enrollment. Borrowers who reenroll in college at least half-time before the end of the grace period will receive the full 6-month grace period when they stop attending or drop below half-time enrollment again.

Several stakeholders commented on the use and duration of Education's grace period policies. One stakeholder said some survivors may return to college prematurely in order to avoid using up the grace period. Two other stakeholders expressed concern that there is no opportunity for survivors to extend the grace period.

³¹We also asked Education and stakeholders about issues related to borrower defense to student loan repayment (borrower defense) and colleges' use of agreements requiring mandatory arbitration or prohibiting class action lawsuits, among other things. Borrower defense is a process that allows eligible borrowers to have some or all of their federal student loan debt discharged if Education determines their college engaged in certain acts or omissions. Education officials and several stakeholders we interviewed noted that these issues do not have a specific application for survivors in the loan repayment context. Most stakeholders we spoke with did not have insights on these issues.

³²Direct PLUS loans made to graduate or professional students and parents of dependent undergraduate students do not have a grace period. However, if borrowers receive a PLUS loan as a graduate or professional student, they automatically receive a 6-month deferment after they graduate, leave college, or drop below half-time enrollment. No payments are required during this 6-month deferment period. Parent borrowers who took out a PLUS loan can request a 6-month deferment after their child graduates, leaves college, or drops below half-time enrollment.

However, borrowers who return to college at least half-time after entering repayment may be eligible to defer repaying their loans until they graduate or drop below half time. Likewise, servicer documentation shows that other options exist to help borrowers who are struggling to repay their loans, such as additional deferments, as well as forbearance and IDR plans.

- *Deferment.* Several types of deferment are available to borrowers who meet certain eligibility requirements. Education officials said that although many deferments are available only for specific populations such as active-duty military service members, other deferments may be appropriate for borrowers who are survivors of sexual violence. For example, survivors struggling to make payments may qualify for an economic hardship deferment, which is available to borrowers who meet eligibility requirements that include having income below a certain level or qualifying for federal means-tested benefits such as Temporary Assistance for Needy Families.³³ Similarly, survivors who are unemployed might apply and qualify for a deferment if they are receiving unemployment insurance benefits or are seeking and unable to find full-time employment.³⁴ Further, as noted earlier, survivors who reenroll in college at least half-time after entering repayment are eligible for an in-school deferment.³⁵
- *Forbearance.* Eligible survivors may postpone or reduce loan payments through a general or mandatory forbearance.³⁶ Education

³³The documentation that borrowers need to submit in order to qualify for a deferment varies by the type of deferment. For example, to apply for the economic hardship deferment, borrowers may need to provide documentation of their monthly income or documentation of payments received under a federal or state public assistance program, such as Temporary Assistance for Needy Families.

³⁴Eligibility for deferment based on economic hardship or unemployment is generally capped at 3 years. During periods of deferment—as with the grace period—interest generally does not accrue on subsidized loans, but it continues to accrue on unsubsidized loans.

³⁵In-school deferments typically do not require borrowers to submit separate documentation to their loan servicers. Rather, in-school deferments are provided automatically in most cases based on enrollment information reported by the colleges.

³⁶Loan servicers can also apply administrative forbearances under certain conditions, such as to cover a specific period necessary to collect and process documentation supporting borrowers' requests to enroll in IDR plans. Three loan servicers' written procedures prompt customer service representatives to tell the borrower that interest will accrue on the loan during the forbearance period. The fourth loan servicer includes information on the implications of interest accrual during forbearance periods in customer service representative training materials.

officials and servicer guidance noted that a forbearance generally will not help borrowers satisfy their loan obligations in the long run.³⁷ According to our review of servicer documentation, servicer staff are instructed to see if other options would be better for individual borrowers. For example, one servicer's guidance states that forbearance should never be the first option offered to borrowers facing financial hardship or the inability to make payments.

- General forbearance: Education officials said servicers could suggest general forbearance for some survivors because it is given to borrowers who request repayment relief due to financial difficulties, medical expenses, changes in employment, or other reasons accepted by the loan servicer. Likewise, servicer guidance generally notes that a forbearance can help in certain situations. For example, one servicer's guidance noted that a forbearance could help give a borrower "room to breathe." Additionally, a general forbearance does not have as many administrative requirements as other postponement and repayment options because a servicer can issue it over the phone with no supporting documentation.³⁸
- Mandatory forbearance: One servicer suggested that borrowers experiencing economic hardship may qualify for a Student Loan Debt Burden mandatory forbearance. This forbearance is available to borrowers if the total payment they owe each month for all their federal student loans is 20 percent or more of their total monthly gross income.³⁹

Repayment options. Eligible borrowers, including survivors, also have access to IDR plans to help them manage their loan repayments. As previously discussed, these plans can make monthly payments more affordable by using a borrower's income and family size to determine the

³⁷With the exception of the COVID-19-related forbearance, interest generally continues to accrue during periods of forbearance, increasing the balance of the loan at the end of the forbearance period. In addition, time in forbearance usually does not count toward loan forgiveness. One exception to this is that months during the COVID-19-related forbearance count toward forgiveness programs and the repayment term for loans in IDR plans.

³⁸As noted earlier, borrowers can remain in a general forbearance for up to 12 months before they have to reapply. Under Education policy, there are no limits on the total amount of time a borrower can spend in general forbearance as long as they do not exceed 36 consecutive months in general forbearance.

³⁹Borrowers applying for a Student Loan Debt Burden forbearance must provide documentation of their monthly income.

amount due, while also forgiving loan balances at the end of the repayment period.

Education's guidance and servicers' procedures note that IDR may be a more appropriate long-term option for managing repayment. For example, on its website, Education suggests that borrowers consider applying for IDR plans—instead of forbearance—if they are unsure when they will be able to afford their monthly payments. Further, borrowers on an IDR plan can have their monthly payments recalculated at any point in time, according to information Education and servicers provide to borrowers. Specifically, according to Education and servicer documentation, if survivors using IDR experience a decrease in income, they can submit the necessary documentation to have the servicer change their monthly loan payment amount. Moreover, servicer procedures suggest that IDR is a long-term solution.

Likewise, we previously reported that IDR plans may be a better option for borrowers who are having difficulty repaying their loans for an extended period of time.⁴⁰ Struggling borrowers on IDR plans are not expected to make higher monthly payments until their financial situation improves, and payments may be as low as \$0 for those who qualify. As previously discussed, the plans also offer the potential for forgiveness of remaining loan balances at the end of the repayment period. We also found that borrowers in some IDR plans had substantially lower rates of default than those in Standard repayment.⁴¹

Spousal income is usually considered in calculating monthly payment amounts on IDR plans if the borrower jointly files federal taxes with a spouse.⁴² However, Education does not consider spousal income for borrowers who certify on the application that they are unable to reasonably access their spouse's income information or are separated

⁴⁰GAO, *Federal Student Loans: Actions Needed to Improve Oversight of Schools' Default Rates*, [GAO-18-163](#) (Washington D.C.: Apr. 26, 2018).

⁴¹We found lower default rates for borrowers in the Income-Based Repayment and Pay As You Earn plans, the two IDR plans included in this analysis. GAO, *Federal Student Loans: Education Could Do More to Help Ensure Borrowers Are Aware of Repayment and Forgiveness Options*, [GAO-15-663](#) (Washington D.C.: Aug. 25, 2015).

⁴²An exception is the Saving on a Valuable Education plan, formerly known as the Revised Pay As You Earn plan, for which spousal income is considered when calculating payments regardless of whether the borrower filed jointly or separately.

from their spouse. Borrowers in this situation would be treated as single for the purpose of calculating payments.⁴³

Agency Comments

We provided a draft of this report to the Department of Education for review and comment. Education had no comments on the draft report. We also provided relevant report sections to the four loan servicers included in our review for their technical comments, which we addressed as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0534 or emreyarrasm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix I.



Melissa Emrey-Arras, Director
Education, Workforce, and Income Security Issues

⁴³Additionally, the Joint Consolidation Loan Separation Act, which was enacted in October 2022, allows a co-borrower to have their portion of a loan, previously consolidated with a spouse's loan, converted into a separate loan. A co-borrower could take this action on their own in certain circumstances, including if they certify that they have experienced an act of domestic violence from the other borrower. According to Education, the separation and new consolidation process is being developed and will be implemented in 2024 or later.

Appendix I: GAO Contact and Staff Acknowledgments

GAO Contact

Melissa Emrey-Arras, (617) 788-0534 or emreyarrasm@gao.gov

Staff Acknowledgments

In addition to the contact named above, Debra Prescott (Assistant Director), Drew Nelson (Analyst in Charge), Michael Alleyne, and Avani Gupta made key contributions to this report. Additional assistance was provided by Elizabeth Calderon, Linda A. Collins, Holly Dye, Carly McCann, Katherine McElroy, Rebecca Sero, Lindsay Shapray, Almeta Spencer, Curtia Taylor, and Adam Wendel.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

A. Nicole Clowers, Managing Director, ClowersA@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548

