

September 27, 2017

Via Email: [negregnominations@ed.gov](mailto:negregnominations@ed.gov)

Ms. Wendy Macias  
U.S. Department of Education  
400 Maryland Avenue SW  
Room 6C111  
Washington, DC 20202

Re: Nominations for Negotiated Rulemaking Committee 1 – Borrower Defenses and Financial Responsibility Issues - Docket ID ED-2017-OPE-0076

Dear Ms. Macias:

On behalf of the National Council of Higher Education Resources (NCHER), thank you for the opportunity to submit the following nominations to serve as negotiators on the negotiating rulemaking committee to develop proposed revisions to the regulations on borrower defenses to repayment of federal student loans and other matters, including whether and to what extent guaranty agencies may charge collection costs to a defaulted borrower who enters into a loan rehabilitation or other repayment agreement within 60 days of being informed that the guaranty agency has paid a claim on the loan. NCHER requests a seat at the negotiating rulemaking committee for:

- Wanda Hall (Edfinancial Services)
- Jaye O'Connell (Vermont Student Assistance Corporation)
- Sheldon Repp (National Council of Higher Education Resources)
- Colleen Slattery (Missouri Higher Education Loan Authority)

NCHER is a national trade association that represents state, nonprofit, and private organizations that administer federal and private education loan programs that make assistance available to students and parents to pay for the costs of postsecondary education. Our membership is the largest such association in the nation, and includes guaranty agencies, loan servicers, loan holders, commercial lenders, private collection agencies, and schools. NCHER has a long history of representing the interests of these constituencies in their efforts to provide funding and services to students, borrowers, families, and postsecondary institutions, and has participated constructively in many of the previous negotiated rulemaking sessions.

As evidenced by the attached summary biographies, our nominees have broad and diverse student loan experience as well as specific legal, servicer, and guarantor expertise. These individuals are subject matter experts who are well-qualified to participate as non-federal negotiators and also have the broad support of NCHER's Board of Directors and membership. NCHER also supports the nomination of Betsy Mayotte, President and Founder of The Institute of Student Loan Advisors, to represent consumer advocates, as well as those nominations made by Education Finance Council and the Student Loan Servicing Alliance.

Thank you for your consideration of these nominations. If I can be of further assistance, please do not hesitate to contact me at (202) 822-2106 or [jbergeron@ncher.us](mailto:jbergeron@ncher.us).

Sincerely,

A handwritten signature in black ink, appearing to read "J P Bergeron". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

James P. Bergeron  
President

Enclosure: Biographies – Wanda Hall, Jaye O’Connell, Sheldon Repp, and Colleen Slattery

## BIOGRAPHIES

### **Wanda Hall**

Senior Vice President  
Chief Compliance Officer  
Edfinancial Services  
298 N. Seven Oaks Drive  
Knoxville, TN 37922  
Phone: 865/342-5350  
Fax: 865/692-6365  
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Wanda Hall is the Senior Vice President and Chief Compliance Officer responsible for the compliance and audits functions at Edfinancial. These areas are responsible for the monitoring and compliance of Federal Family Education Loan Program (FFELP), Direct Loan, and private student loan related law, regulations, and policies, program reviews and audits, and Federal Student Aid (FSA) and ombudsman relations. She is the Program Manager representing the Higher Education Servicing Corporation/ Edfinancial Not-for-Profit team in working with FSA and the servicing relationship. She has been employed in the student loan industry for 42 years, working for the Ohio Student Aid Commission for 19 years, InTuition Services for 5 years, and Edfinancial Services the remaining time. Ms. Hall has been an active member of the National Council of Higher Education Resources (NCHER) since 1989, was a member of the Program Regulations and Policy Committee for 20 years, served as the Servicer Liaison on the Board of Directors for 7 years, and is a recipient of the 2009 Jean S. Frohlicher Outstanding Service Award and the 2017 Chalmers Gail Norris Lifetime Achievement Award. She has also served on the Student Loan Servicing Alliance (SLSA) Board of Directors for 9 years. She has served as a negotiator in 5 of the U.S. Department of Education's Negotiated Rulemaking sessions for negotiating new federal regulations.

### **Jaye O'Connell**

Director of Collections, Compliance, and Information Security Officer  
Vermont Student Assistance Corporation  
10 E Allen Street  
Winooski, VT 05404  
Phone: 802/542-2388  
E-mail: [connell@vsac.org](mailto:connell@vsac.org)

Jaye O'Connell has worked in the student loan industry at the Vermont Student Assistance Corporation (VSAC) for over 20 years. As the Director of Collections and Compliance, she oversees default collections and is responsible for identifying, understanding, and implementing laws and regulations applicable to VSAC loan programs and servicing functions. In 2010, she was named VSAC's Information Security Officer and is accountable for the development and maintenance of the Corporation's System Security Plans. Within the student loan industry, Ms. O'Connell currently serves as a member of the National Council of Higher Education Resources' Program Regulations and Policy Committee and is an At-large Board member of the Student Loan Servicing Alliance (SLSA). Since 2004, she has also served on the SLSA Private Loan Committee, and served as Chair from 2008 to 2012. Ms. O'Connell was the Alternate Negotiator representing Federal Family Education Loan Program guaranty agencies and guaranty agency servicers for the Negotiating Rulemaking Committee on Borrower Defenses to Repayment in 2016. Ms. O'Connell received her Bachelor of Arts from St. Lawrence University and is a graduate of the Vermont Leadership Institute through the Snelling Center for Government.

**Sheldon Repp**

Special Advisor and Counsel  
National Council of Higher Education Resources  
1100 Connecticut Avenue, NW, Suite 1200  
Washington, DC 20036  
Phone: 202/822-2106  
Fax: 202/822-2142  
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Shelly Repp currently serves as Special Advisor and Counsel to the National Council of Higher Education Resources (NCHER), which represents a nationwide network of lenders, loan holders, loan servicers, guaranty agencies, collectors, schools, and other organizations involved in the administration of the Federal Family Education Loan Program (FFELP), the Direct Loan Program, and private supplemental education loans. He has a nearly 40-year legal background in student financial aid, with a specialty in issues concerning the federal student loan programs. Prior to joining NCHER in 1999 as its General Counsel and serving as its President from 2011-2014, Mr. Repp worked in the Office of the General Counsel at the former U.S. Department of Health, Education, and Welfare, where he was involved in many of the legislative, regulatory, and administrative issues that arose in the formative years of the Guaranteed Student Loan Program (now called the FFELP). He also served as Vice President and Deputy General Counsel at Sallie Mae where he was responsible for supervising all legal work relating to Sallie Mae's student loan transactions, as well as providing legal advice on legislative and regulatory matters, as well as some borrower, class action litigation. He was a negotiator in the initial negotiated rulemaking for the William D. Ford Federal Direct Loan Program in 1994.

**Colleen Slattery**

Federal Contract and Compliance Officer  
Missouri Higher Education Loan Authority (MOHELA)  
63 Spirit Drive  
Chesterfield, MO 63005  
Phone: 866/333-7860 ext. 3929  
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Email: [colleens@mohela.com](mailto:colleens@mohela.com)

Colleen Slattery currently serves as the Federal Contract and Compliance Officer for the Missouri Higher Education Loan Authority (MOHELA). In this capacity, she is responsible for monitoring, interpreting, and adherence to federal and state statutes and regulations relative to student loans made under the William D. Ford Federal Direct Loan Program, Family Education Loan Program (FFELP), and private student loan programs. Ms. Slattery is also responsible for the management of MOHELA's federal servicing contract with the U.S. Department of Education, Office of Federal Student Aid. Ms. Slattery is a member of the National Council of Higher Education Resources (NCHER) Program Regulations and Policy Committee and also participates in the NCHER Income-Based Repayment Workgroup, the NCHER Common Manual Workgroup, and various workgroups associated with Federal Servicing. She is also a Board Member of the Student Loan Servicing Alliance (SLSA) and is a member of the SLSA Membership Committee, SLSA Servicing Operation Committee, and SLSA Private Loan Committee. She is a Member of the National Contract Management Association (NCMA). Ms. Slattery holds a Bachelor of Science in Business Management from Maryville University. Ms. Slattery joined MOHELA in 1995 and has been engaged in policy and compliance for the Authority in excess of 20 years.