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United States Senate

COMMITTEE ON BANKING, HOUSING, AND
URBAN AFFAIRS

WASHINGTON, DC 20510-6075

April 13, 2026

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Andrea Lenox
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GSS Data Services, LLC
402 W. Broadway
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Dear Mr. Doherty, Mr. Myers, and Ms. Lenox,

Thank you for your response to my letter regarding Goal Solutions's relationship with the National Collegiate Student Loan Trusts (NCSLTs or the Trusts).¹ I appreciated the information provided in your response and write to request further information about which specific parties or entities hire, supervise, and/or direct GSS Data Services, LLC's (GSSDS) work for the Trusts.

In your November 6, 2025 response, you stated that while Goal Structured Solutions, LLC (Goal) "does not have any direct involvement with the NCSLTs," a subsidiary of Goal, GSSDS, is "the Administrator" for the Trusts.² In the role of Administrator, GSSDS "handles back office administrative tasks" including the "preparation and distribution of Distribution Reports," "the payment of certain Trust expenses," and "the handling of certain aspects of the distribution of payments to Trust investors."³ Your response asserts that GSSDS "does not assist [the Trusts] in the process of selling loans" and "does not hire debt collectors or servicers...on the NCSLT's behalf."⁴ It also states that GSSDS's involvement with the Trusts is "pursuant to Administration Agreements," which "do not impose any servicing obligations on the Administrator."⁵

¹ Letter from Ranking Member Elizabeth Warren to Goal Solutions President, Matt Myers, October 23, 2025, <https://www.banking.senate.gov/imo/media/doc/Warren%20letter%20to%20Myers%20Goal%20Solutions.pdf>.

² Letter from John. P. Doherty on behalf of Goal Solutions Services, to Ranking Member Elizabeth Warren, Oct. 23, 2025, on file with Committee.

³ *Id.*

⁴ *Id.*

⁵ *Id.*

This response raises further questions regarding the Trusts' activities. First, the Trusts have no direct employees,⁶ which leaves the extent of GSSDS's involvement and authority in the Trusts operations as the organization's Administrator ambiguous. Second, GSSDS's Administration Agreements appear to provide GSSDS with significant latitude to involve itself in the Trusts' activities. Specifically, the Administration Agreement made public in 2024 as part of a now-dismissed Consumer Financial Protection Bureau lawsuit states that "[i]n carrying out its duties under this Agreement with respect to delinquent or defaulted Student Loans, the Administrator may retain and employ agents to collect on such Student Loans and to commence any actions or proceedings the agents deem necessary in connection with such collection efforts on such Student Loans."⁷ It appears to give GSSDS express authority to enter agreements "[i]n carrying out any of [the Trusts'] obligations ... either directly or through agents, attorneys, accountants, independent contractors and auditors."⁸

Although Goal and GSSDS were dismissed from lawsuits because they do not hold or service the loans, your response prompts questions about whether GSSDS has historically or currently held any role in interacting with the Trusts' servicers and subservicers. I seek answers to the following requests to allow me to better understand the direction of the Trusts. Please provide responses no later than April 27, 2026:

1. Name any and all specific parties/trustees involved in hiring GSS Data Services, LLC as "Administrator" for the Trusts. Provide the name and contact information (including email addresses and company names) of all such parties.
2. Provide any and all names of parties that direct and supervise GSS Data Services, LLC's work as "Administrator" for the Trusts. Provide the name and contact information (including email addresses and company names) of all such parties for the entirety of GSS Data Services, LLC's relationship with the Trusts.
3. Provide copies of all Administration Agreements between Goal, or any of its subsidiaries, and the Trusts.
4. Where a borrower of a loan held by the Trusts requests, via a servicer, that the Trusts, as holder, offer a modification of loan terms beyond what is permitted by the borrowers' promissory note, what role does GSS Data Services, LLC play as "administrator" when adjudicating this request?
5. Where a borrower of a loan held by the Trusts requests, via a servicer, that the Trusts, as holder, offer a modification of loan terms within the scope what is permitted by the borrowers' promissory note, what role does GSSDS play as "administrator" when adjudicating this request? For example, when a borrower requests to release a co-signer

⁶ Complaint ¶ 12, Consumer Financial Protection Bureau v. National Collegiate Master Student Loan Trust, No. 1:17-cv-01323-UNA, (D. Del., 2017), https://files.consumerfinance.gov/f/documents/201709_cfpb_national-collegiate-student-loan-trusts_complaint.pdf.

⁷ Ex. 3, Administration Agreement, Consumer Financial Protection Bureau v. Pennsylvania Higher Education Assistance Agency et al., No. 1:24-cv-00756-JPW (M.D. Pa., 2024).

⁸ *Id.*

pursuant to the co-signer release provision of a promissory note, please describe the role each party plays in adjudicating this request. If these roles have changed over time, please provide a detailed description of the changes and the rationale for each change.

6. Where a borrower of a loan held by the Trusts requests, via a servicer, that the Trusts, as holder, offer a modification of loan terms as required under federal law, what role does GSSDS play as “administrator” when adjudicating this request? For example, when a servicemember requests an interest rate reduction pursuant to the Servicemember Civil Relief Act, please describe the role each party plays in adjudicating this request. If these roles have changed over time, please provide a detailed description of the changes and the rationale for each change.
7. Has Goal, GSSDS or any subsidiaries or parent companies had any role at any time in hiring, interacting with, or consulting the servicers or subservicers of the Trusts?
 - a. If so, explain the nature and history of this role and provide relevant dates.
 - b. If not, provide any and all companies that have had this role to the best of your knowledge.

Sincerely,



Elizabeth Warren
Ranking Member
Committee on Banking,
Housing, and Urban Affairs