

#	Subject	Summary of Change to <i>Common Manual</i>	Type of Update	Effective Date
979	Providing Consolidation Loan Information to Borrowers	<p><u>15.3.A Providing Consolidation Loan Information</u></p> <p>Revises language to acknowledge electronic delivery methods. Also suggests that consolidating lenders provide Consolidation loan applicants with a complete explanation of any applicable loss of loan benefits if a borrower is consolidating loans from other loan programs into a Federal Consolidation loan and an explanation of any special benefits the lender may offer on Federal Consolidation loans and the criteria for obtaining those benefits.</p>	Guarantor	July 1, 2008, unless implemented earlier by the lender.
980	Borrowing from FFELP and FDLP	<p><u>4.1.A Establishing Eligibility</u></p> <p>Clarifies that a school may certify loans of different types (Stafford or PLUS) in separate programs for the same enrollment period and same student.</p>	Federal	Stafford and PLUS loans certified on or after December 1, 2006, unless implemented earlier by the school.
981	Federal Data Matches	<p><u>5.2 Federal Data Matches</u> <u>5.2.A Citizenship Data Match</u> <u>5.2.D Prior Overpayment</u> <u>5.2.E Prior Default</u> <u>Appendix F FFELP Community Initiatives</u></p> <p>Removes from Appendix F, FFELP Community Initiatives, the information on the NSLDS data match and adds it to Section 5.2 Federal Data Matches. Also adds information on the DOJ data match, the USCIS data match, and the VA data match. Current references in 5.2.A to the Immigration and Naturalization Service (INS) have been replaced with references to the USCIS, which now performs the citizenship data match.</p>	Correction	Implementation of any federal data match is determined by the Department.

#	Subject	Summary of Change to <i>Common Manual</i>	Type of Update	Effective Date
982	Required Authorizations for Delivering Parent PLUS Loan Funds to the Student	<p><u>8.3 Required Authorizations</u></p> <p>States that a school must obtain a parent PLUS borrower's written authorization to deliver parent PLUS loan funds directly to the student, in addition to any other authorization it must obtain from the student (e.g., an authorization to deliver funds to the student's bank account or to the student's stored-value card).</p>	Correction	Publication date of the 97-98 FSA Handbook.
983	Release of Endorser	<p><u>12.4.E Endorser Due Diligence</u></p> <p>Aligns the Manual's text with the history Appendix to specify that when a loan is discharged due to the borrower's total and permanent disability, bankruptcy, closed school, false certification, or unpaid refund, the endorser is released from his or her obligation to repay the loan. Also specifies that an endorser is released from his or her obligation to repay the loan when he or she files an adversary proceeding before the bankruptcy court on the basis of undue hardship and the loan obligation is discharged, and when he or she is determined to be totally and permanently disabled after the loan becomes delinquent.</p>	Correction	Retroactive to the implementation of the <i>Common Manual</i> .

Batch 144 - approved

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COMMON MANUAL - GUARANTOR POLICY PROPOSAL

Date: November 15, 2007

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	with no changes	Nov 15

SUBJECT: Providing Consolidation Loan Information to Borrowers

AFFECTED SECTIONS: 15.3.A Providing Consolidation Loan Information

POLICY INFORMATION: 979/Batch 144

EFFECTIVE DATE/TRIGGER EVENT: July 1, 2008, unless implemented earlier by the lender.

BASIS:
None.

CURRENT POLICY:
Current policy is written from the perspective of lenders providing written documentation and information to potential Consolidation loan borrowers.

REVISED POLICY:
Revised policy acknowledges electronic delivery methods. In addition, revised policy suggests that consolidating lenders provide Consolidation loan applicants with a complete explanation of any applicable loss of loan benefits if a borrower is consolidating loans from other loan programs into a Consolidation loan and an explanation of any special benefits the lender offers on Federal Consolidation loans, and the criteria for obtaining those benefits.

REASON FOR CHANGE:
This change acknowledges that lenders and guarantors provide consolidation counseling materials in a number of media, including electronic media, which is not addressed in the current policy. The change that suggests that consolidating lenders provide additional Consolidation loan information to applicants may result in a benefit to Consolidation loan borrowers.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Subsection 15.3.A, page 6, column 1, paragraph 1, as follows:

15.3.A Providing Consolidation Loan Information

The lender is encouraged to provide information to prospective Consolidation loan borrowers to help them make informed decisions about consolidation. The lender may wish to provide the following types of ~~documentation~~ information:

...

~~Fact Sheet~~ Explanation of Consolidation Benefits and Costs

An explanation of consolidation benefits and costs may include loan fact sheet can clearly explain:

- Benefits of consolidation to the borrower.
- Special benefits the lender offers on Federal Consolidation loans, and the criteria for obtaining those benefits.
- ...
- ...

- ...
- ...
- ...
- ...
- The borrower's potential loss of benefits on underlying loans when consolidated into a Consolidation loan.
- The borrower's cost for consolidation.
- The consolidation process.

Worksheet or Web Page

A Consolidation loan worksheet or Web page can help the borrower:

- List all outstanding education loans.
- ...
- ...
- ...
- Calculate estimated monthly payments under standard, graduated, extended, and or income-sensitive repayment schedules.
- ...
- ...

Instructions

The lender ~~should~~ may include instructions for ~~filling out~~ completing the Federal Consolidation Loan Application and Promissory Note, and, if the note is available electronically, a link to the appropriate Website.

**PROPOSED LANGUAGE - COMMON BULLETIN:
Providing Consolidation Loan Information to Borrowers**

The *Common Manual* has been revised in Subsection 15.3.A to acknowledge current technologies in the delivery of information to prospective Consolidation loan borrowers. The Manual has also been revised to suggest that consolidating lenders provide Consolidation loan applicants with a complete explanation of any applicable loss of loan benefits if a borrower is consolidating loans from other loan programs into a Consolidation loan and an explanation of any special benefits that the lender may offer on Federal Consolidation loans and the criteria for obtaining those benefits.

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower:

None.

School:

None.

Lender/Service:

None.

Guarantor:

None.

U.S. Department of Education:

None.

To be completed by the Policy Committee

POLICY CHANGE PROPOSED BY:

CM Policy Committee

DATE SUBMITTED TO CM POLICY COMMITTEE:

September 26, 2006

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

November 8, 2007

PROPOSAL DISTRIBUTED TO:

CM Policy Committee

CM Guarantor Designees

Interested Industry Groups and Others

CM Governing Board Representatives

Comments Received From:

AES/PHEAA, ASA, CSLF, Great Lakes, HESAA, HESC, KHEAA, NASFAA, NCHELP, NSLP, OGSLP, PPSV, SCSLC, SLMA, SLND, SLSA, TG, USA Funds, and VSAC

Responses to Comments

Many of the commenters supported this proposal as written. Other commenters recommended wordsmithing changes that made no substantive changes to the policy but that added clarity to the proposed language. We appreciate the review of all commenters, their careful consideration of this policy, and their assistance in crafting clear, concise policy statements.

COMMENT:

One commenter did not support the two new bullets added under the "Explanation of Consolidation Benefits and Costs" subheading. Specifically, the commenter did not understand the text of new bullet #2 that refers to a lender's "Special Consolidation loan programs...their respective criteria and benefits." The commenter pointed out that there is only one Federal Consolidation Loan Program. The commenter also felt that new bullet #9 – "The borrower's loss of benefits on other loans when consolidated into a Federal Consolidation loan" – is problematic as it may be interpreted to refer to loss of benefits provided by an underlying loan holder, and a consolidating lender may have no knowledge of the borrower benefits provided by underlying loan holders. In addition, the commenter indicated that Final Rules scheduled to be published on November 1 and other proposed legislation may necessitate additional changes.

Response:

The Committee appreciates the commenter's concerns. With respect to the new bullet #2 that suggests a consolidating lender *may* want to provide prospective borrowers with "special consolidation loan programs the lender offers and their respective criteria and benefits," this information is related to the Consolidation loan program parameters that a lender may offer that differ from those offered under the standard Consolidation loan. We can see that the language used could be confusing, so it has been revised to address the commenter's point.

In regards to the new bullet #9 – "The borrower's loss of benefits on other loans when consolidated into a Federal Consolidation loan" – the intent was not to suggest that the consolidating lender obtain information regarding the benefits a borrower may have on the loans being consolidated, but rather to suggest that the consolidating lender simply inform a prospective borrower that if the borrower does, indeed, have loans that have benefits above and beyond the standard benefits provided through the loan program, these benefits may be lost when consolidation occurs. The lender could offer as an example the Perkins loan deferments that are lost when a borrower consolidates these loans through a Consolidation loan.

The Committee does not understand the impact the soon-to-be-released Final Rules would have on this

subsection of the *Common Manual* as the NPRM did not contain any additional Consolidation loan disclosure requirements, but will be sure to properly evaluate the Final Rules and any legislation to identify any such requirements that may need to be included. Also, the Committee would like to emphasize that the information listed in this subsection is only suggested and not required; therefore, lenders are not required to provide this type of information, but may do so to assist prospective Consolidation loan borrowers.

Change:

Bullet #2 under the subheading “Explanation of Consolidation Benefits and Costs” has been revised to read:

- ~~Special benefits the lender offers on Federal Consolidation Loans, programs the lender offers and their respective criteria and benefits for obtaining those benefits.~~

COMMENT:

One commenter suggested revising the heading of the subsection to read: “Providing Consolidation Loan Information to Applicants” (or “Prospective Borrowers” as an alternate).

Response:

The Committee disagrees as the paragraph under the heading already describes that the information is for prospective Consolidation loan borrowers.

Change:

None.

COMMENT:

One commenter suggested revising the sentence under the subheading “Explanation of Consolidation Benefits and Costs” to read as follows:

Explanation for Consolidation benefits and costs may include:

Response:

The Committee agrees, with a slight revision.

Change:

The first sentence under the revised subheading “Explanation of Consolidation Benefits and Costs” has been revised to read:

An explanation of Consolidation benefits and costs may include ~~Consolidation loan fact sheet can clearly explain:~~

COMMENT:

One commenter suggested changing “other” to “underlying” in the new bullet #9. In addition, this commenter recommended we remove “Interactive” from the subheading “Worksheet or Interactive Web Page” and from the descriptive sentence as it would imply that non-interactive or informational Web sources are not permitted.

Response:

The Committee agrees.

Change:

The new bullet #9 has been revised to read:

The borrower’s loss of benefits on ~~other~~ underlying loans when consolidated into a Federal Consolidation loan.

Also, the descriptive word “Interactive” has been removed from the subheading and descriptive sentence as suggested by the commenter.

COMMENT:

One commenter suggested that the sentence under the subheading “Instructions” be revised to include the formal name of the Consolidation application and promissory note.

Response:

The Committee agrees.

Change:

The sentence under the subheading "Instructions" has been revised as follows:

The lender may include instructions for completing the Federal Consolidation Loan ~~a~~Application and ~~p~~Promissory ~~n~~Note, and, if the note is available electronically, a link to the appropriate Website.

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COMMON MANUAL - FEDERAL POLICY PROPOSAL

Date: November 15, 2007

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	with no changes	Nov 15

SUBJECT: Borrowing from FFELP and FDLP

AFFECTED SECTIONS: 4.1.A Establishing Eligibility

POLICY INFORMATION: 980/Batch 144

EFFECTIVE DATE/TRIGGER EVENT: Stafford and PLUS loans certified on or after December 1, 2006, unless implemented earlier by the school.

BASIS:
HEA §454(a)(4); *Federal Register* dated November 1, 2006, pp. 64392 and 64400; 07-08 FSA Handbook, Volume 3, Chapter 5, p. 3-78.

CURRENT POLICY:
Current policy states that the parent of an eligible student may borrow under only the program (FFELP or FDLP) from which the student borrowed, or would have borrowed, if the student had received a loan.

REVISED POLICY:
Revised policy clarifies that a school may certify loans of different types (Stafford, PLUS) in separate programs for the same period of enrollment and same student.

REASON FOR CHANGE:
This change aligns the Manual's text with the Department's interpretation of HEA §454(a)(4), which was codified in final rules published in the November 1, 2006, *Federal Register*.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Subsection 4.1.A, page 3, column 1, paragraph 4, as follows:

**4.1.A
Establishing Eligibility**

...

A school may participate in the FFELP and the Federal Direct Student Loan Program (FDLP) and the FFELP at the same time. However, a school is prohibited from certifying a loans of the same type (be it Stafford or PLUS) under both each programs for the same borrower student for the same loan period of enrollment. A school may, though, certify a PLUS loan under either program, and a Stafford loan under the other program, when the loans benefit the same student for the same period of enrollment. The parent of an eligible student may borrow only under the program (FFELP or FDLP) from which the student borrowed, or would have borrowed if the student had received a loan For example, the school may certify a Stafford loan under the FFELP and a PLUS loan under the FDLP for the same student for the same period of enrollment.

[HEA §454(a)(4); 07-08 FSA Handbook, Volume 3, Chapter 5, p. 3-78]

**PROPOSED LANGUAGE - COMMON BULLETIN:
Borrowing from the FFELP and FDLP**

The *Common Manual* has been updated to clarify that a school that participates in both the FFELP and the Federal Direct Loan Program (FDLP) may certify loans of different types (Stafford, PLUS) under separate programs for the same period of enrollment for the same student. For example, the school may certify a Stafford loan under the FFELP and a PLUS loan under the FDLP for the same period of enrollment. A school is prohibited from certifying a loan of the same type under each program for the same student for the same period of enrollment.

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower:

A borrower or a student may benefit from additional loan program options at schools that participate in both the FFELP and the FDLP.

School:

A school that participates in both the FFELP and the FDLP may certify a PLUS loan for a parent or for a graduate or professional student through either the FFELP or the FDLP, and a Stafford loan for that same period of enrollment under the other program.

Lender/Service:

None.

Guarantor:

A guarantor may need to modify its school program review procedures.

U.S. Department of Education:

The Department may need to modify its school program review procedures.

To be completed by the Policy Committee

POLICY CHANGE PROPOSED BY:

CM Policy Committee

DATE SUBMITTED TO CM POLICY COMMITTEE:

November 22, 2006

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

November 8, 2007

PROPOSAL DISTRIBUTED TO:

CM Policy Committee
CM Guarantor Designees
Interested Industry Groups and Others
CM Governing Board Representatives

Comments Received From:

AES/PHEAA, ASA, CSLF, Great Lakes, HESAA, HESC, KHEAA, NASFAA, NCHELP, NSLP, OGSLP, PPSV, SCSLC, SLMA, SLND, SLSA, TG, UHEAA, USA Funds, and VSAC.

Responses to Comments

Most of the commenters supported this proposal as written. Other commenters recommended wordsmithing changes that made no substantive changes to the policy but that added clarity to the proposed language. We appreciate the review of all commenters, their careful consideration of this policy, and their assistance in crafting clear, concise policy statements.

COMMENT:

One commenter requested that the title for the Common Bulletin be changed to clarify that this change effects all PLUS loans not just PLUS loans for graduate students.

Response:

The Committee agrees.

Change:

The title of the Common Bulletin has been changed to "Borrowing from the FFELP and FDLP."

COMMENT:

Several commenters noted that all references to the 2007-2008 Federal Student Aid Handbook had been

abbreviated as 07-08 FSA Handbook.

Response:

The Committee adopted a new style convention for the 2007-2008 *Common Manual* that no longer uses the full year and title of the Handbook, but instead uses, for example “07-08 FSA Handbook.”

Change:

None.

COMMENT:

Several commenters recommended wordsmithing changes to provide clarity to the revised text and example. Two commenters also requested the replacement of the word “in” with “for” in the last sentence to avoid the implication that the loans are certified during the period of enrollment.

Response:

The Committee thanks the commenters for their thorough review and appreciates their recommendations.

Change:

The Proposed Language has been revised to incorporate the commenters’ recommendations, as follows:

“A school may participate in the FFELP and the Federal Direct Student Loan Program (FDLP) and the FFELP at the same time. However, a school is prohibited from certifying a loans of the same type (be it Stafford or PLUS) under both each programs for the same borrower student for the same loan period of enrollment. A school may, though, certify a PLUS loan under either program, and a Stafford loan under the other program, when the loans benefit the same student for the same period of enrollment. The parent of an eligible student may borrow only under the program (FFELP or FDLP) from which the student borrowed, or would have borrowed if the student had received a loan For example, the school may certify a Stafford loan under the FFELP and a PLUS loan under the FDLP for the same student for the same period of enrollment.”

[HEA §454(a)(4); 07-08 FSA Handbook, Volume 3, Chapter 5, p. 3-78]

COMMENT:

One commenter suggested revising the 07-08 FSA Handbook reference to include the specific location within the sidebar on p. 3-78.

Response:

The Committee appreciates the commenter’s suggestion, however the *Common Manual* style convention is to list only the page number in the Handbook where the information is found.

Change:

None.

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COMMON MANUAL - CORRECTION POLICY PROPOSAL

Date: November 15, 2007

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	with changes	Nov 15

SUBJECT: Federal Data Matches

AFFECTED SECTIONS: 5.2 Federal Data Matches
5.2.A Citizenship Data Match
5.2.D Prior Overpayment
5.2.E Prior Default
Appendix F FFELP Community Initiatives

POLICY INFORMATION: 981/Batch 144

EFFECTIVE DATE/TRIGGER EVENT: Implementation of any federal data match is determined by the Department.

BASIS:
None.

CURRENT POLICY:

Current policy includes information about NSLDS in Appendix F, FFELP Community Initiatives. Current policy does not include information on the National Student Loan Data System (NSLDS) data match, Department of Justice (DOJ) data match, Department of Homeland Security, United States Citizenship and Immigration Service (USCIS) data match, or the Department of Veteran's Affairs (VA) data match within the section on federal data matches.

REVISED POLICY:

Revised policy removes from Appendix F, FFELP Community Initiatives the information on the NSLDS. Information on the NSLDS data match has been added to Section 5.2 Federal Data Matches. Information has also been added within this Section on the DOJ data information match, the USCIS data match, and the VA data match. Current references in 5.2.A to the Immigration and Naturalization Service (INS) have been replaced with references to the USCIS, which now performs the citizenship data match. References to the 06-07 FSA Handbook have been updated to reflect the 07-08 FSA Handbook.

REASON FOR CHANGE:

The *Common Manual* is being revised to provide information on additional federal data matches required in determining student and borrower eligibility. NSLDS information has been removed from Appendix F, FFELP Community Initiatives, as NSLDS is no longer an initiative but a fully operating system which is owned and maintained by the Department. Current references in 5.2.A to the INS have been replaced with references to the Department of Homeland Security, United States Citizenship and Immigration Service (USCIS) which now performs the citizenship data match.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Section 5.2, page 3, column 2, paragraph 3, as follows:

5.2 Federal Data Matches

When a student submits a completed Free Application for Federal Student Aid (FAFSA), the Department of Education assists the school in determining the student's eligibility as a Stafford loan borrower, a Grad PLUS loan borrower, or as the dependent student of a parent PLUS loan borrower. The Department conducts federal data matches concerning of the citizenship, Social Security number, Selective Service registration, ~~and~~ student financial aid ~~overpayment or default history~~ information, and veteran status that the student reports or certifies on the FAFSA. In addition, the Department conducts data matches on individuals convicted of federal or state drug offenses subject to denial of benefits under court orders.

The results of the data matches with the ~~Immigration and Naturalization Service~~ Department of Homeland Security, United States Citizenship and Immigration Service (USCIS), Social Security Administration (SSA), Selective Service System (SSS), and National Student Loan Data system (NSLDS), and Department of Veterans Affairs (VA) are reported to the school and the student. For more information about confirming a student's citizenship status, Social Security number, Selective Service registration, or student financial aid ~~overpayment or loan default status~~ history information, or denial of Title IV benefits due to court orders, or veteran status, see Subsections 5.2.A, 5.2.B, 5.2.C, 5.2.D, ~~and 5.2.E, and 5.2.F~~. Schools may also obtain more information about the Department's data matches from the ~~2006-2007 Federal Student Aid~~ 07-08 FSA Handbook, Application and Verification Guide, Chapter 2, p. AVG-27, Volume 1, Chapter 1, p. 12 and Volume 1, Chapters 2 to 5, pp. 1-217 to 1-49 61.

Revise, Subsection 5.2.A, page 4, column 2, paragraph 1, as follows:

5.2.A Citizenship Data Match

- ...
- ...
- Information on citizenship status and documentation may be found in the ~~most recent publication of the 2006-2007 Federal Student Aid Handbook~~ 07-08 FSA Handbook, Volume 1, chapter 2, pp. 1-197 to 1-340. Schools . . .

U.S. Citizens and Nationals

- ...

If the status of a student or parent borrower as a U.S. citizen or a U.S. national must be documented, the following are permissible forms of certification:

- A copy of the birth certificate showing that the student or parent borrower was born in the United States.
- A Certificate of Citizenship (N600) from the U.S. ~~Immigration and Naturalization Service (INS)~~ Department of Homeland Security, United States Citizenship and Immigration Service (USCIS), which must include at least the student or parent borrower's name and application number, the certificate number (found in the upper right-hand corner), and the date the certificate was issued.
- A Certificate of Naturalization from the ~~INS~~ USCIS, which must contain at least the student or parent borrower's name and petition number, the certificate number (found in the upper right-hand corner), the ~~INS~~ USCIS A-Number, the name of the court that granted the naturalization, and the date of naturalization.
- A Report of Birth Abroad of a Citizen of the United States (FS-240), Certificate of Birth-Foreign Service (FS-545), Certificate of Birth (DS-1350), or Freedom of Information Act Form (~~INS~~ USCIS Form G-639). The first three forms are generated by the State Department and include an embossed seal with the words "United States of America" and "State Department."
- ...

If the student or parent borrower submits a citizenship or naturalization certificate as documentation of his or her citizenship status, the school must place a copy of the form in the student's file, demonstrating that proof of citizenship was obtained (see the ~~2006-2007 Federal Student Aid~~ 07-08 FSA Handbook, Volume 1, Chapter 2, p. 1-198).

Eligible Noncitizens

A noncitizen is considered eligible for Stafford or PLUS loans if he or she meets all other applicable eligibility criteria and is:

- . . .
- A refugee with a Departure Record (1-94) from the ~~INS~~ USCIS showing one of the following designations (indicating that the refugee is in the United States for other than a temporary purpose):
 - Refugee.
 - Asylum granted.
 - Alien paroled into the U.S. for at least one year.
 - Alien granted a stay of deportation [pursuant to 8 U.S.C. section 1253(h)] due to fear of persecution on account of race, religion, or political opinion.
 - Conditional Entrant (valid if 1-94 was issued before April 1, 1980).

~~To establish the eligibility of a noncitizen, a school must by performing a data match with another agency, such as the INS USCIS. If the student reports on the FAFSA that he or she is an eligible noncitizen (and, therefore could be eligible for federal student aid) and reports an Alien Registration number, that information is checked against the database maintained by the USCIS. This process is also known as primary confirmation. If a student or parent borrower's eligible noncitizen status is not verified by this procedure, the school must transmit copies of the student's or parent borrower's documentation of immigration status to the INS USCIS. This process constitutes secondary confirmation. For purposes of secondary confirmation, a school may not require a student or parent borrower to produce evidence from the INS USCIS that he or she is a permanent resident of the U.S. or is in the U.S. for other than a temporary purpose with the intention of becoming a citizen or permanent resident if both of the following conditions are applicable.~~

- . . .
- . . .

A school may not deny eligibility to an applicant based on immigration status while awaiting primary confirmation from the ~~INS~~ USCIS . . .

A school may deliver funds to an otherwise eligible student pending ~~INS~~ USCIS response to the secondary confirmation if at least 15 business days have elapsed since the school submitted the documentation to the ~~INS~~ USCIS . . .

Revise Subsection 5.2.D, page 6, column 1, paragraph 4 as follows:

5.2.D
Prior Overpayment NSLDS Data Match

Another data match that is conducted when a student submits a Free Application for Federal Student Aid (FAFSA) is with the National Student Loan Data System (NSLDS). The Central Processing System (CPS) matches the student's information against the NSLDS to see if the student is in default on a Title IV loan, owes a Title IV overpayment, or has exceeded applicable Stafford loan limits. The CPS matches the student's FAFSA information with his or her financial aid history in the NSLDS database. The school must resolve any conflict between the NSLDS and other information prior to delivering Title IV aid. For more information on the NSLDS, see 07-08 FSA Handbook, Volume 1, Chapter 3 and NSLDS Reference provided on the IFAP website.

Prior Overpayment

A borrower is ineligible for a FFELP loan if he or she is liable for an overpayment to any Title IV program. By certifying a Stafford or PLUS loan, a school certifies that the student borrower-or the parent ~~and~~ or dependent student, in the case of a parent PLUS loan-does not, to its knowledge, owe a grant overpayment with an original balance of more than \$50 to a grant program resulting from a return of Title IV funds calculation, . . .

Revise Subsection 5.2.D, by moving the existing language in 5.2.E to a subtitle following the Prior Overpayment subtitle as follows:

Prior Default

A prospective Stafford or PLUS loan borrower is ineligible for a FFELP loan if he or she, or the student for whom a parent borrower is seeking a PLUS loan, has an outstanding, unresolved default on any Title IV loan (a FFELP loan, FDLP loan, Federal Perkins loan, or Federal Insured Loan) obtained for attendance at any school.

In determining whether the student or parent borrower has ever defaulted on any Title IV loan, a school may rely on the information provided by the student or parent borrower during the loan process and on NSLDS financial aid history information unless the school receives conflicting information. The school must reconcile all conflicting information before delivering any funds, and must retain documentation that clearly substantiates its determination that the student or parent borrower’s prior default was resolved. Documentation stating that the reporting entity has “no record” of the student or parent borrower’s default is not considered adequate.

A student or parent borrower . . .

- . . .
- . . .
- . . .
- . . .
- . . .
- . . .

. . .

Reinstatement of Title IV Eligibility after Default

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- . . .
- . . .
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- . . .
- . . .
- . . .

Documentation Required to Prove Default Resolution

. . .

Revise Subsection 5.2.E, page 6, column 2, paragraph 2, as follows:

5.2.E
Prior Default Department of Justice Data Match

~~A prospective Stafford or PLUS loan borrower is ineligible for a FFELP loan if he or she, or the student for whom a parent borrower is seeking a PLUS loan, has an outstanding, unresolved default on any title IV loan (a FFELP loan, FDLP loan, Federal Perkins loan, or Federal Insured Loan) obtained for attendance at any school.~~

~~In determining whether the student or parent borrower has ever defaulted on any Title IV loan, a school may rely on the information provided by the student or parent borrower during the loan process and on National Student Loan Data System (NSLDS) financial aid history information unless the school receives conflicting information.~~

~~A student or parent borrower ...~~

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- ~~• ...~~
- ~~• ...~~
- ~~• ...~~
- ~~• ...~~
- ~~• ...~~

~~...~~

Reinstatement of Title IV Eligibility after Default

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~~...~~

Documentation Required to Prove Default Resolution

~~...~~

~~* ...~~

A separate data match is performed by CPS against a file provided by the Department of Justice (DOJ). This data matching program provides information regarding individuals convicted of federal or state offenses involving drug trafficking or possession of a controlled substance who have been denied Title IV program benefits by federal or state courts. This

ensures that federal student aid is not awarded to individuals subject to denial of these benefits under court orders. For more information on the DOJ data match, see the 07-08 FSA Handbook, Volume 1, Chapter 1, p. 1-12.

Revise Section 5.2, page 8, column 1, by inserting a new Subsection as follows:

5.2.F
Department of Veterans Affairs Data Match

If a student has indicated on the Free Application for Federal Student Aid (FAFSA) that he or she is an eligible veteran of the U.S. Armed Forces, the student is considered to be independent and does not have to provide parental income and asset information to apply for Title IV aid. The CPS matches data with the Department of Veterans Affairs (VA) to confirm that an applicant who states that he or she is a veteran on the FAFSA has engaged in active duty in the U.S. Armed Forces for purposes other than training, or was a cadet or midshipman at a service academy; and was released under a condition other than dishonorable. For more information on the VA data match, see the 07-08 FSA Handbook, Application and Verification Guide, Chapter 2, p. AVG-27.

Revise Appendix F, Community Initiatives, page 5, column 2 by removing all information regarding NSLDS as follows:

~~National Student Loan Data System (NSLDS)~~

~~The National Student Loan Data System (NSLDS) is a comprehensive national database containing information about the federal financial aid history of student who receive assistance under Title IV of the Higher Education Act of 1965 as amended. The system has three main purposes:~~

- ~~• ...~~
- ~~• ...~~
- ~~• ...~~
- ~~...~~
- ~~...~~
- ~~...~~
- ~~...~~

~~For more information on NSLDS Technical Updates and Newsletters, go to <http://ifap.ed.gov/IFAPWebApp/currentNSLDSPage.jsp>.~~

PROPOSED LANGUAGE - COMMON BULLETIN:

Federal Data Matches

The *Common Manual* has been updated to include information on the National Student Loan Data System (NSLDS), the Department of Justice (DOJ), and the Department of Veterans Affairs (VA) federal data matches required in determining student and borrower eligibility. NSLDS information has been removed from Appendix F, FFELP Community Initiatives, as NSLDS is no longer an initiative, but a fully operating system which is owned and maintained by the Department. Current references in 5.2.A to the Immigration and Naturalization Service (INS) have been replaced with references to the Department of Homeland Security, United States Citizenship and Immigration Service (USCIS), which now performs the citizenship data match.

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower:
None.

School:
None.

Lender/Service:
None.

Guarantor:
None.

U.S. Department of Education:
None.

To be completed by the Policy Committee

POLICY CHANGE PROPOSED BY:
CM Policy Committee

DATE SUBMITTED TO CM POLICY COMMITTEE:
May 15, 2007

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

PROPOSAL DISTRIBUTED TO:
CM Policy Committee
CM Guarantor Designees
Interested Industry Groups and Others
CM Governing Board

Comments Received From:
ES/PHEAA, ASA, College Assist, CSLF, EAC, Great Lakes, GSMR, HESAA, HESC, KHEAA, NASFAA, NCHELP, NSLP, OGSLP, PPSV, SCSLC, SLMA, SLND, SLSA, TG, UHEAA, USA Funds, and VSAC.

Responses to Comments

Most of the commenters supported this proposal as written. Other commenters recommended wordsmithing changes that made no substantive changes to the policy but that added clarity to the proposed language. We appreciate the review of all commenters, their careful consideration of this policy, and their assistance in crafting clear, concise policy statements.

COMMENT:

One commenter noted that a new *Federal Register* specified the agency name of Department of Homeland Security (DHS) to the Department of Homeland Security, United States Citizenship and Immigration Services (USCIS).

Response:

The Committee thanks the commenter for their thorough review.

Change:

The name has been revised to reflect the update as suggested.

COMMENT:

One commenter felt that the DOJ data match was not a "data match in the way all the other data matches work." They explained that the DOJ sends a list to CPS and CPS reviews the list for matches and places a hold on the borrower's loan or application. They felt that the information and title were not clear.

Another commenter requested that language be revised within 5.2.E to clarify that the DOJ match affects only Federal Student Aid, not state or institutional aid.

Response:

The Committee agrees with both commenters.

Change:

The first sentence under 5.2.E, Department of Justice Data Match has been revised to reflect the difference in the process with this match program as follows:

"A separate data match is performed by CPS against a file provided by the Department of Justice (DOJ)."

Subsection 5.2.E has been modified as follows:

A separate data match is performed by CPS against a file provided by the DOJ. This data matching program provides information regarding individuals convicted of federal or state offenses involving drug trafficking or possession of a controlled substance who have been denied Title IV program benefits by federal or state courts. This ensures that ~~student financial assistance~~ federal student aid is not awarded to individuals subject to denial of these benefits under court orders.

COMMENT:

One commenter noted that victims of human trafficking are also eligible as non-citizens and should be added to the list of eligible noncitizens.

Response:

The Committee agrees and will address this in a separate Federal Policy Proposal.

Change:

None.

COMMENT:

One commenter suggested changing the references to NSLDS data from "overpayment or default information" to student financial aid history information. The commenter felt this was more accurate as NSLDS also contains information about borrowing in excess of loan limits.

Response:

The Committee agrees.

Change:

The references to NSLDS data "overpayment or default information" have been changed to student financial aid "history" information.

COMMENT:

One commenter noted that the first sentence in paragraph one, page 5 subsection 5.2.A, Eligible Noncitizens, is incorrect in stating that a school "must" perform a data match with another agency to establish the eligibility of a noncitizen.

Response:

The Committee agrees that the sentence should be clearer.

Change:

The sentence has been revised as follows:

"A school must verify To establish the eligibility of a noncitizen. This may be done a school must by performing a data match with another agency, such as the INS USCIS."

COMMENT:

Several commenters noted that all references to the 2007-2008 Federal Student Aid Handbook had been abbreviated as 07-08 FSA Handbook.

Response:

The Committee adopted an new style convention for the 2007-2008 *Common Manual* that replaces the full spelling of the Handbook with 07-08 FSA Handbook.

Change:

None.

COMMENT:

One commenter noted that the language in Section 5.2 omitted some of the original *Common Manual* language.

Response:

The Committee agrees.

Change:

Section 5.2 language has been revised to match the original language in the *Common Manual* text.

COMMENT:

One commenter requested modifying the Revised Policy and Proposed Language to clarify that the entire subsection on NSLDS is being removed from Appendix F.

Response:

The Committee agrees.

Change:

The Revised Policy language has been changed as follows:

“Revised policy removes from Appendix F, FFELP Community Initiatives the information on the NSLDS. Information on the NSLDS data match has been added to Section 5.2 Federal Data Matches.”

The Proposed Language - *Common Manual* has been revised as follows:

“Revise Appendix F, Community Initiatives, page 5, column 2 by removing all information regarding NSLDS as follows:”

COMMENT:

One commenter noted that several of the form names and numbers needed to be updated within the “U.S. Citizens and National” text.

Response:

The Committee agrees and will address the form names and numbers in a separate proposal.

Change:

None.

om/edited-bb

981-1083 144

COMMON MANUAL - CORRECTION POLICY PROPOSAL

Date: November 15, 2007

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	with no changes	Nov 15

SUBJECT: Required Authorizations for Delivering Parent PLUS Loan Funds to the Student

AFFECTED SECTIONS: 8.3 Required Authorizations

POLICY INFORMATION: 982/Batch 144

EFFECTIVE DATE/TRIGGER EVENT: Publication date of the 97-98 FSA Handbook.

BASIS:
97-98 FSA Handbook, Chapter 10, pp. 34 and 41.

CURRENT POLICY:
Current policy does not address the authorization required in order for the school to deliver a credit balance of parent PLUS loan funds to the student.

REVISED POLICY:
Revised policy states that a school must obtain a parent PLUS borrower's written authorization to deliver parent PLUS loan funds directly to the student, in addition to any other authorization it must obtain from the student (e.g., an authorization to deliver funds to the student's bank account or to the student's stored-value card).

REASON FOR CHANGE:
This change is necessary to clarify that a parent borrower's authorization must be obtained in order for a school to deliver a credit balance of a parent PLUS loan to the student.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Section 8.3, page 4, column 1, paragraph 1, as follows:

8.3 Required Authorizations

A school must have written authorization from a student or parent borrower, as applicable, to perform the following activities:

- Deliver Stafford or PLUS loan proceeds received by EFT or master check to the student or parent borrower. This authorization is obtained when the borrower signs the Stafford or PLUS MPN.
[§682.604(c)(3)]
- Use the Stafford or PLUS loan proceeds to pay for current-year charges other than tuition, fees, and contracted room and/or board (see Subsection 8.7.H).
[§668.164(d)(2)(i); §668.165(b)(1)(i)]
- Deliver Stafford or PLUS loan proceeds to the borrower's personal bank account.
[§668.165(b)(1)(i)]
- Deliver Stafford or PLUS loan proceeds via a stored-value card.
[DCL GEN-05-16]
- Hold a credit balance on behalf of the student or parent borrower, unless prohibited by the Department.
[§668.165(b)(1)(iii)]

- Use Stafford or PLUS loan proceeds for the current year to pay for minor prior-year charges (see subsection 8.7.H).
[§668.164(d)(2)(ii)]

A school must obtain a parent PLUS borrower's written authorization to deliver parent PLUS loan funds directly to the student in addition to any other authorization it must obtain from the student (e.g., an authorization to deliver funds to the student's bank account or to the student's stored-value card).

PROPOSED LANGUAGE - COMMON BULLETIN:

Required Authorization for Delivering Parent PLUS Loan Funds to the Student

The *Common Manual* has been revised to clarify that a school must obtain a parent PLUS borrower's written authorization to deliver parent PLUS loan funds directly to the student, in addition to any other authorization it must obtain from the student (e.g., an authorization to deliver funds to the student's bank account or to the student's stored-value card).

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower:

None.

School:

None.

Lender/Service:

None.

Guarantor:

None.

U.S. Department of Education:

None.

To be completed by the Policy Committee

POLICY CHANGE PROPOSED BY:

CM Policy Committee

DATE SUBMITTED TO CM POLICY COMMITTEE:

August 6, 2007

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

November 8, 2007

PROPOSAL DISTRIBUTED TO:

CM Policy Committee

CM Guarantor Designees

Interested Industry Groups and Others

CM Governing Board Representatives

Comments Received From:

AES/PHEAA, CSLF, EAC, Great Lakes, GSMR, HESAA, HESC, KHEAA, NASFAA, NSLP, OGSLP, PPSV, SCSLC, SLMA, SLND, SLSA, TG, UHEAA, USA Funds, and VSAC.

Responses to Comments

Many of the commenters supported this proposal as written. Other commenters recommended wordsmithing changes that made no substantive changes to the policy but that added clarity to the proposed language. We

appreciate the review of all commenters, their careful consideration of this policy, and their assistance in crafting clear, concise policy statements.

COMMENT:

One commenter recommended revising all references to FSA Handbook citations to provide consistency with *Common Manual* convention and similar citations already included in the *Common Manual*.

Response:

The Committee recently determined that several Manual conventions should be changed for simplicity, including references to the FSA Handbook. As a result, in proposed policy language and in other sections of policy proposals such as the basis and effective date/trigger event, the Committee will use the commonly known acronym for federal student aid, "FSA," in references to the Handbook. The publication date of the Handbook will now be expressed as two sets of two-digit years, for example, "97-98." Also, the Committee will subsequently advance an organizational policy proposal to explain in the Manual's introduction the acronym "FSA" associated with references to the FSA Handbook in the Manual's policy text. Existing policy text will be aligned later through technical edits.

Change:

None.

COMMENT:

Two commenters noted that the basis should include page 41 of the 97-98 FSA Handbook.

Response:

The Committee agrees.

Change:

The basis as been revised as follows:

97-98 FSA Handbook, Chapter 10, pp. 34 and 41.

COMMENT:

One commenter recommended that a citation be included at the end of paragraph 2 in the proposed language.

Response:

The Committee agrees.

Change:

The following citation has been added to the end of the paragraph:

A school must obtain a parent PLUS borrower's written authorization to deliver parent PLUS loan funds directly to the student, in addition to any other authorization it must obtain from the student (e.g. an authorization to deliver funds to the student's bank account or to the student's stored-value card).

[07-08 FSA Handbook, Volume 4, Chapter 2, p. 4-31]

COMMENT:

One commenter recommend a change to the revised policy statement to clarify that a school may not hold funds on the student's account or use the funds to pay minor prior-year charges.

Response:

The commenter's observation is accurate: a school may not hold a credit balance of parent PLUS loan funds or use those funds to pay minor, prior year charges on the student's account at the school without the parent's authorization. However, these are only two of several actions a school may not perform without a parent borrower's authorization according to current policy reflected in the existing bullets under section 8.3.

Instead of modifying the revised policy summary to restate all of the actions for which a school must obtain a parent borrower's authorization under current policy, the Committee believes the revised policy statement should focus only on the Manual revision that is the focus of this policy proposal, i.e., the authorization to pay parent PLUS proceeds to the student.

Change:

The revised policy statement as been revised as follows:

~~Revised policy clarifies that parent PLUS loan proceeds not credited to authorized school charges must be delivered to the parent borrower, unless the parent borrower authorizes the school to deliver those funds to the student~~ states that a school must obtain a parent PLUS borrower's written authorization to deliver parent PLUS loan funds directly to the student, in addition to any other authorization it must obtain from the student (e.g., an authorization to deliver funds to the student's bank account or to the student's stored-value card).

COMMENT:

Two commenters supported the proposal, but recommended that additional language be included in Section 8.3 to encourage students (and parent PLUS borrowers) to authorize the school to return Title IV credit balances to the lender to reduce the borrower's Title IV loan obligation.

Response:

The Committee appreciates the commenters' careful review of this proposal, but believes that the suggestion falls outside the scope of the proposal. The Committee will consider the commenters' suggestion for a future policy proposal.

Change:

None.

dt/edited-tm

982-J008 144

COMMON MANUAL - CORRECTION POLICY PROPOSAL

Date: November 15, 2007

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	with no changes	Nov 15

SUBJECT: Release of Endorser

AFFECTED SECTIONS: 12.4.E Endorser Due Diligence

POLICY INFORMATION: 983/Batch 144

EFFECTIVE DATE/TRIGGER EVENT: Retroactive to the implementation of the *Common Manual*.

BASIS:

§682.402(c)-(f) and (l); the Endorser Addendum to Federal PLUS Loan Application and Master Promissory Note; Conditional disability discharge guidance developed in coordination with NCHelp and the Department's Conditional Disability Discharge Unit.

CURRENT POLICY:

The Manual's Appendix H, but not the current policy text, specifies that an endorser is released from his or her repayment obligation if the borrower dies; on or after July 23, 1992, the student for whom a parent received a PLUS loan dies; or the loan is discharged for any other reason.

REVISED POLICY:

Revised policy aligns the Manual's text with Appendix H to specify that when a loan is discharged due to the borrower's total and permanent disability, closed school, false certification, or unpaid refund, the endorser is released from his or her obligation to repay the loan. Revised policy also specifies that an endorser is released from his or her obligation to repay the loan when he or she files an adversary proceeding before the bankruptcy court on the basis of undue hardship and the loan obligation is discharged, and when he or she is determined to be totally and permanently disabled after the loan becomes delinquent.

REASON FOR CHANGE:

This policy clarifies that an endorser is also released from his or her obligation to repay the loan in certain cases when a borrower's loan is discharged. This policy proposal was developed as a result of comments the Policy Committee received to Proposal 956 in Batch 141.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Subsection 12.4.E, page 14, column 2, paragraph 4, by adding new bullets, as follows:

Releasing the Endorser

A lender may release an endorser from his or her repayment obligation on a loan in any of the following cases: If the loan is only partially discharged, the endorser remains obligated for the undischarged portion of the loan.

- A release is provided in writing before the loan becomes delinquent, and the endorser was not obtained due to a PLUS loan borrower's adverse credit.
- The borrower dies or the student for whom a parent obtained a PLUS loan dies. [§682.402(b)(1) and (4)]
- The borrower receives a final determination of total and permanent disability loan discharge. [§682.402(c)]
- The loan is discharged on the basis of undue hardship as a result of an adversary proceeding filed by the endorser before a bankruptcy court. [§682.402(f)]

- The borrower receives a loan discharge based on the dependent student's inability to complete a course of study because the school closes, or due to the false certification of the loan by the school.
[§682.402(d) and (e)]
- The loan is partially or completely discharged due to an unpaid refund.
[§682.402(l)]
- The endorser dies, and the lender receives evidence of the endorser's death, such as a copy of the death certificate or other proof of the endorser's death that is acceptable under applicable state law.
- The endorser becomes totally and permanently disabled after the loan becomes delinquent.
- At the discretion of the guarantor.

PROPOSED LANGUAGE - COMMON BULLETIN:

Release of Endorser

The *Common Manual* has been revised to align the Manual's policy text with Appendix H, by including additional instances in which an endorser may be released from his or her obligation to repay a loan or some portion of a loan. A lender may release an endorser from his or her repayment obligation on a loan if the borrower's obligation to repay the loan is discharged through total and permanent disability, false certification loan discharge, closed school loan discharge, or unpaid refund loan discharge. If only a portion of the borrower's loan is discharged, the endorser remains obligated on any remaining portion of the loan. In addition, an endorser may be released because of the endorser's bankruptcy proceedings or total and permanent disability.

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower:

None.

School:

None.

Lender/Service:

None.

Guarantor:

None.

U.S. Department of Education:

None.

To be completed by the Policy Committee

POLICY CHANGE PROPOSED BY:

CM Policy Committee

DATE SUBMITTED TO CM POLICY COMMITTEE:

April 16, 2007

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

November 8, 2007

PROPOSAL DISTRIBUTED TO:

CM Policy Committee

CM Guarantor Designees
Interested Industry Groups and Others
CM Governing Board Representatives

Comments Received From:

AES/PHEAA, ASA, CSLF, Great Lakes, HESAA, HESC, KHEAA, NASFAA, NCHELP, NSLP, OGSLP, PPSV, SCSLC, SLMA, SLND, SLSA, TG, USA Funds, and VSAC

Responses to Comments

Many of the commenters supported this proposal as written. Other commenters recommended wordsmithing changes that made no substantive changes to the policy but that added clarity to the proposed language. We appreciate the review of all commenters, their careful consideration of this policy, and their assistance in crafting clear, concise policy statements.

COMMENT:

One commenter does not support the proposal as written and suggests revising the fourth bullet to include a clarifying statement that the endorser was the one who filed the adversary proceeding. The commenter stated that clarification is necessary to ensure that the policy speaks to bankruptcies filed by the endorser.

Response:

The Committee agrees.

Change:

The fourth bullet has been revised as follows:

- “The loan is discharged on the basis of undue hardship as a result of an adversary proceeding filed by the endorser before a bankruptcy court. [§682.402(f)]”

Revised Policy Statement and Common Bulletin language have also been revised accordingly.

COMMENT:

Two commenters recommended deleting from the sixth bullet of the proposed language the sentence “The endorser remains obligated for any portion of the loan that is not discharged.” The commenters stated that the sentence’s inclusion here was repetitive, as the information was contained in the introductory paragraph to this subsection and that an endorser would remain obligated for the portion of the loan that is not discharged in all of the listed cases, not just in the case of an unpaid refund.

Response:

The Committee agrees. In addition to the changes recommended, the Committee has revised the introductory paragraph and combined the sixth and seventh bullets.

Change:

The introductory paragraph has been revised as follows:

“A lender may release an endorser from his or her repayment obligation on a loan in any of the following cases: If the loan is only partially discharged, the endorser remains obligated for the undischarged portion of the loan.”

The sixth bullet has been revised as follows:

- “The loan is partially or completely discharged due to an unpaid refund. The borrower receives a partial loan discharge due to unpaid refund. The endorser remains obligated for any portion of the loan that is not discharged. [§682.402(l)]”

COMMENT:

One commenter suggested for development in a new proposal the addition that the endorser is relieved of his or her obligation to repay the loan upon determination that the endorser is totally and permanently disabled. Another commenter recommended adding that after the loan enters a delinquent or default status, the

endorser can be relieved of their obligation to repay the loan if he or she becomes totally and permanently disabled. Guidance on this matter was provided by the Department of Education's Disability Discharge Unit in August 2006.

Response:

The Committee agrees. The Committee was able to weave this suggestion into this proposal instead of developing a new proposal.

Change:

A new bullet has been added after the seventh bullet as follows:

- The endorser dies, and the lender receives evidence of the endorser's death, such as a copy of the death certificate or other proof of the endorser's death that is acceptable under applicable state law.
- The endorser becomes totally and permanently disabled after the loan becomes delinquent.

Revised Policy Statement and Common Bulletin language have also been changed accordingly. In addition, the conditional disability discharge guidance developed in coordination with NCHELP and the Department's Conditional Disability Discharge Unit has been added to the Basis.

COMMENT:

One commenter suggested adding references to 9/11 discharge information in a future release of policy proposals.

Response:

The Committee agrees. With the final rules for the 9/11 discharge information recently issued, the Committee is working to develop policy proposals that address this topic.

Change:

None.

sm/edited-chh

983-1076 144