



Unified Student Loan Policy

**POLICY UPDATE PROPOSALS –ACTION REQUIRED
COMMENTS DUE MONDAY, NOVEMBER 27, 2017**

TO: *Common Manual* Governing Board Representatives
Interested Industry Groups and Others

FROM: Benjamin Lee
Great Lakes, CM Policy Development and Maintenance Contractor (PDMC)

RE: *Common Manual* Policy Update
[Batch 212: Proposals 1324 & 1325]

DATE: November 3, 2017

The PDMC issues **Batch 212** for review and comment.

Policies 1324 & 1325 are federal policy proposals and are intended to align *Common Manual* text with federal regulations and other federal publications.

Policy updates are distributed to all guarantors and others in the FFELP community for the opportunity to comment before Governing Board review and approval.

Please review the policy updates and provide written comments by Monday, November 27, 2017, to:

Benjamin Lee
Great Lakes Higher Education Guaranty Corporation
E-Mail: Policy@glhec.org

Special Note: With Governing Board approval, the Policy and Development Maintenance Contractor (PDMC) has undertaken a project to reorganize the Manual to streamline the content and better align it with today's FFELP loan servicing landscape. Because no new FFELP loans have been originated since July 1, 2010, much of the information contained in the body of the Manual is now outdated and obsolete. Through the reorganization project, we are separating the outdated information from what is relevant to lenders administering FFELP portfolios and schools dealing with existing FFELP borrowers. The text of the Manual will be separated into three parts:

- Part A will include the information relevant to servicing FFELP loans. This Part will continue to be updated as needed based on changes in federal or guarantor policy.
- Part B will include policy guidance that was applicable during the time that FFELP loans were originated but is no longer relevant. This Part will not be updated as no new FFELP loans are being originated. However, because the content includes the policies that were in place and applicable at the time the FFELP loans were made, the information is being retained for historical and program research purposes.
- Part C will include most of the current appendices, with the exception of a few that are no longer applicable to FFELP servicing; those will be placed in Part B. The appendices remaining in Part C will continue to be updated as needed.

The proposals in Batch 212 are impacted by the reorganization project and include instructions to that effect.

If you have any questions about the enclosed proposals or the reorganization project, please contact Benjamin Lee via phone at 608-246-1580 or via email at Policy@glhec.org.

Enclosures:

Policy Proposal Transmittal
Common Manual Policy Proposals (1324 & 1325)

Common Manual Policy Proposal Batch 212 Transmittal

November 3, 2017

#	Subject	Summary of Change to <i>Common Manual</i>	Type of Update	Effective Date
1324	HEROES Act Waivers	<p>H.4.B HEROES Act Waivers</p> <p>The Department has announced another extension of the HEROES Act waivers and modifications and added updates to align the waivers and modifications with statutory and regulatory changes since the last extension. The Department has also clarified certain terms from the Act. Except for the extension of the HEROES waivers, there are no changes to the waivers and modifications for existing FFELP borrowers and loans.</p>	Federal	September 29, 2017
1325	Disaster Waivers	<p>H.4.D Disaster Waivers</p> <p>Revisions to Subsection H.4.D will add guidance related to federally declared major disasters issued by the Department in 2017.</p>	Federal	August 29, 2017

Batch 212 (Out for Comment)

COMMON MANUAL – FEDERAL POLICY PROPOSAL

Date: November 3, 2017

X	DRAFT	Comments Due	11/24/17
	FINAL	Consider at GB meeting	
	APPROVED	With Changes/No Changes	

SUBJECT: HEROES Act Waivers

AFFECTED SECTIONS: H.4.B HEROES Act Waivers

POLICY INFORMATION: 1324/Batch 212

EFFECTIVE DATE/TRIGGER EVENT: September 29, 2017

BASIS:

Pub. L. 108—76, 20 U.S.C. 1098bb(b), *Federal Registers* dated September 29, 2017 (82 FR 45465) and October 17, 2017 (82 FR 48195).

CURRENT POLICY:

The Higher Education Relief Opportunities for Students (HEROES) Act requires the Department of Education to publish waivers or modifications to statutory or regulatory provisions applicable to the Title IV federal student aid programs. The Department originally announced the HEROES Act waivers and modifications in 2003 and has extended them multiple times since, most recently in 2012.

REVISED POLICY:

The Department has announced another extension of the HEROES Act waivers and modifications and added updates to align the waivers and modifications with statutory and regulatory changes since the last extension. The Department has also clarified certain terms from the Act. Except for the extension of the HEROES waivers, there are no changes to the waivers and modifications for existing FFELP borrowers and loans.

REASON FOR CHANGE:

This change conforms common policy to guidance published in the September 29, 2017 *Federal Register* (82 FR 45465), which announces the extension of the HEROES Act modifications and waivers. In addition, the Department issued a later, complimentary *Federal Register* which clarified certain terms from the Act. Those definitions have been added to the Manual.

Note on Reorganization: With Governing Board approval, the Policy and Development Maintenance Contractor (PDMC) has undertaken a project to reorganize the Manual to better align it with today's FFELP loan servicing landscape by separating historical content from what is relevant to lenders administering FFELP portfolios and schools dealing with existing FFELP borrowers. The historical content will be placed in a separate Part of the Manual and will no longer be updated, while the relevant text will stay in the main section of the Manual and continue to be updated.

The text in this proposal is impacted by the reorganization plan and is the reason for adding two new subheadings and splitting Figure H-2 into two separate figures. It will allow for easier separation of content for reorganization purposes. Figure H-2, and the corresponding text that follows, contains content that will be placed in the historical part of the Manual and not updated. Figure H-3, and the corresponding text that follows, will stay in the main part of the Manual and will be updated as necessary.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Section H.4.B, page 146, column 2, paragraph 1 as follows:

The Higher Education Relief Opportunities for Students (HEROES) Act of 2003 (P.L. 108-76) requires the Department to publish waivers or modifications to statutory or regulatory provisions applicable to the Title IV federal student aid programs. The HEROES Act directs the Department to publish waiver and modifications that are appropriate to assist "affected individuals" who are also federal student aid applicants and recipients. The Department originally announced the HEROES Act waivers in a *Federal Register* notice dated December 12, 2003, effective until September 30, 2005. Subsequent extensions in 2005, 2007, 2012, and changes published in the *Federal Register* notice September 27, 2012, again

extend the waivers to September 30, 2017~~22~~.

Not all waivers and modifications apply to all affected individuals. The Department designated four categories of waiver recipients, and identified specific waivers and modifications that apply to each category. In addition to granting waivers to affected individuals, the Department also granted waivers to the dependents and spouses of two categories of affected individuals (see Figures H-2 and H-3 under “HEROES Act Waivers and Modifications”).

Revise Section H.4.B, page 147, column 1, adding two new bullets as follows:

- “National emergency” means a national emergency declared by the President of the United States.
- “Qualifying National Guard duty during a war or other military operation or national emergency” means service as a member of the National Guard on fulltime National Guard duty (as defined in 10 U.S.C. 101(d)(5)) under a call to active service authorized by the President or the Secretary of Defense for a period of more than 30 consecutive days under 32 U.S.C. 502(f), in connection with a war, another military operation, or a national emergency declared by the President and supported by Federal funds.
- “Serving on active duty during a war or other military operation or national emergency” includes service by an individual who is: (A) a Reserve member of an Armed Force ordered to active duty under 10 U.S.C. 12301(a), 12301(g), 12302, 12304, or 12306, or any retired member of an Armed Force ordered to active duty under 10 U.S.C. 688, for service in connection with a war or other military operation or national emergency, regardless of the location at which that active duty service is performed; and (B) any other member of an Armed Force on active duty in connection with any war, operation, or emergency or subsequent actions or conditions who has been assigned to a duty station at a location other than the location at which the member is normally assigned.

Revise Section H.4.B, page 147, column 2, paragraph 1 as follows:

Figures H-2 and H-3 lists, by topic, each of the statutory and regulatory waivers or modifications the Department authorizes and identifies the individuals to which that waiver or modification applies. Statutory and regulatory waiver and modification topics listed in Figures H-2 and H-3 and in the more detailed waiver or modification descriptions that follow are presented in life-of-a-loan order, corresponding to the progression of policies within the *Common Manual* to the extent possible.

Revise Figure H-2 HEROES Act Waivers and Modifications, page 148 as follows:

HEROES Act Waivers and Modifications no Longer Applicable to Existing FFELP Loans or Borrowers

Figure H-2

WAIVER TOPIC	Current Requirement Reference	WAIVER RECIPIENT*					
		U.S. Armed Forces Member	Dependent or Spouse of U.S. Armed Forces Member	National Guard Member	Dependent or Spouse of National Guard Member	Individual Lived or Worked in Declared Disaster Area	Individual Suffered Direct Economic Hardship
1. Signatures required for the FAFSA, SAR, and ISIR	09-10 FSA Handbook, Application and Verification Guide, Chapter 2, p. AVG-39		X		X		
2. Reinstatement of Title IV Eligibility	5.2.E; 09-10 FSA Handbook, Volume 1, Chapter 3, p. 1-52	X		X		X	
32. Professional Judgment	6.5.D, 6.6.B; 09-10 FSA Handbook, Application and Verification Guide, Chapter 5, p. AVG-105	X		X		X	X

43. Need Analysis	6.6; 07-08 FSA Handbook, Application and Verification Guide, Chapter 3	X	X	X	X	X	X
64. Verification of AGI and Income Tax Paid	8.5; 09-10 FSA Handbook, Application and Verification Guide, Chapter 4, pp. AVG-87 and AVG-90	X		X			
65. Verification Signature Requirements	8.5; 09-10 FSA Handbook, Application and Verification Guide, Chapter 4, pp. AVG-86 to AVG-87		X		X		
76. Cash Management – Borrower Notice to Cancel Loan	8.2.D; 09-10 FSA Handbook, Volume 4, Chapter 1, pp. 4-3 to 4-5	X		X		X	
87. Cash Management – Required Authorizations	8.3; 09-10 FSA Handbook, Volume 4, Chapter 1, pp. 4-6 to 4-7	X		X		X	
98. Satisfactory Academic Progress	8.4; 09-10 FSA Handbook, Volume 2, Chapter 10, p. 2-125	X		X		X	
409. Delivering Credit Balances for a Withdrawn Student	8.8.D; 09-10 FSA Handbook, Volume 5, Chapter 2, pp. 5-42 to 5-44	X		X		X	
4110. Approved Leave of Absence	9.3; 09-10 FSA Handbook, Volume 5, Chapter 2, pp. 5-32 to 5-38	X		X		X	
4211. Refund of Institutional Charges	9.5.A; 09-10 FSA Handbook, Volume 5, Chapter 2, pp. 5-38 to 5-41	X		X			
4312. Return of Title IV Funds – Post-withdrawal Disbursements	9.5.A; 09-10 FSA Handbook, Volume 5, Chapter 2, p. 5-96	X		X		X	
4413. Return of Title IV Funds –Grant Overpayments Owed by the Student	9.5.A; 09-10 FSA Handbook, Volume 5, Chapter 2, p. 5-104	X		X		X	X
45. In-School and Grace Period	40.2, 40.3.C	X		X		X	
46. Deferment – In-School and Graduate Fellowship	11.5, 11.6; Figure 11-4	X		X		X	
47. Forbearance	41.23.B	X		X		X	
48. Rehabilitation of Defaulted Loans	43.7	X		X		X	
49. Loan Forgiveness	43.9.A	X		X		X	

20. Consolidating Defaulted Title IV Loans	15.2	X		X		X	
21. Collection Activities on Defaulted Title IV Loans	§682.410; 07-08 FSA Handbook, Volume 6	X		X		X	
22. Annual Reevaluation Requirements for Income-Based Repayment	10.8.D	X		X		X	

* See the subheading "Affected Individuals," above, for detailed information about criteria that HEROES Act waivers and modification recipients must meet.

Revise Section H.4.B, page 150, column 1, as follows:

For each topic discussed below, any applicable statutory or regulatory requirement is summarized and followed by a description of the waiver or modification that pertains to that requirement.

Topics No Longer Applicable to Existing FFELP Loans

1. *Signatures Required on the Free Application for Federal Student Aid (FAFSA), Student Aid Report (SAR), and Institutional Student Information Record (ISIR)* (see the 09-10 FSA Handbook, Application and Verification Guide, Chapter 2, p. AVG-39)

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- ~~2. *Reinstatement of Title IV Eligibility* (see Subsection 5.2.E and the 09-10 FSA Handbook, Volume 1, Chapter 3, p. 1-52)~~

~~To have eligibility for Title IV aid reinstated, a defaulted borrower must make satisfactory repayment arrangements, i.e., six consecutive, full, monthly payments to the appropriate holder of each defaulted loan. These payments must be made on time (within 15 days of the payment due date), voluntarily (directly by the borrower, regardless of whether there is a judgment against the borrower), and must be reasonable and affordable.~~

~~The requirement for the borrower to make consecutive payments in order to reestablish eligibility for Title IV aid is waived. Guarantors should not treat any payment missed during the time that a borrower is an affected individual as an interruption in the requisite six consecutive, monthly, on-time payments. When the borrower is no longer considered to be an affected individual, or in a 3-month transition period that immediately follows, the required sequence of qualifying payments may resume at the point at which they were discontinued as a result of the borrower's status.~~

Topics 3 through 14 are redesignated as 2 through 13.

Insert new Figure H-3 directly after newly designated topic 13 as follows:

HEROES Act Waivers and Modifications
Applicable to Existing FFELP Loans or Borrowers

Figure H-3

<u>WAIVER TOPIC</u>	<u>Current Requirement Reference</u>	<u>WAIVER RECIPIENT*</u>					
		<u>U.S. Armed Forces Member</u>	<u>Dependent or Spouse of U.S. Armed Forces Member</u>	<u>National Guard Member</u>	<u>Dependent or Spouse of National Guard Member</u>	<u>Individual Lived or Worked in Declared Disaster Area</u>	<u>Individual Suffered Direct Economic Hardship</u>
1. <u>Reinstatement of Title IV Eligibility</u>	5.2.E; 16-17 FSA Handbook, Volume 1, Chapter 3, p. 1-55	X		X		X	

2. In-School and Grace Period	10.2, 10.3.C	X		X		X	
3. Deferment – In-School and Graduate Fellowship	11.5, 11.6; Figure 11-1	X		X		X	
4. Forbearance	11.23.B	X		X		X	
5. Rehabilitation of Defaulted Loans	13.7	X		X		X	
6. Loan Forgiveness	13.9.A	X		X		X	
7. Consolidating Defaulted Title IV Loans	15.2	X		X		X	
8. Collection Activities on Defaulted Title IV Loans	§682.410: 16-17 FSA Handbook, Volume 6	X		X		X	
9. Annual Reevaluation Requirements for Income-Based Repayment	10.8.D	X		X		X	

*See the subheading "Affected Individuals." above, for detailed information about criteria that HEROES Act waivers and modification recipients must meet.

Revise Section H.4.B, page 154, column 1, as follows:

4413. Return of Title IV Funds – Grant Overpayments Owed by the Student (see Subsection 9.5.A and the 09-10 FSA Handbook, Volume 5, Chapter 2, p. 5-104)

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Topics Currently Applicable to Existing FFELP Loans or Borrowers

1. Reinstatement of Title IV Eligibility (see Subsection 5.2.E and the 16-17 FSA Handbook, Volume 1, Chapter 3, p. 1-55)

To have eligibility for Title IV aid reinstated, a defaulted borrower must make satisfactory repayment arrangements, i.e., six consecutive, full, monthly payments to the appropriate holder of each defaulted loan. These payments must be made on time (within 15 days of the payment due date), voluntarily (directly by the borrower, regardless of whether there is a judgment against the borrower), and must be reasonable and affordable.

The requirement for the borrower to make consecutive payments in order to reestablish eligibility for

Title IV aid is waived. Guarantors should not treat any payment missed during the time that a borrower is an affected individual as an interruption in the requisite six consecutive, monthly, on-time payments. When the borrower is no longer considered to be an affected individual, or in a 3-month transition period that immediately follows, the required sequence of qualifying payments may resume at the point at which they were discontinued as a result of the borrower's status.

Topics 15 through 22 are redesignated as 2 through 9.

Revise Section H.4.B, page 155, column 2, newly redesignated topic 8 as follows:

218 Collection Activities on Defaulted Loans (see 34 CFR 682.410 and the ~~07-08~~16-17 FSA Handbook, Volume 6)

PROPOSED LANGUAGE - COMMON BULLETIN:

HEROES Waivers

The *Common Manual* is being revised to incorporate the Department's recent extension of the HEROES Act waivers and modifications, announced in a September 29, 2017 *Federal Register*.

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower: Borrowers who are also affected individuals will continue to be eligible for HEROES Act waivers and modifications.

School: Schools should continue to follow the HEROES waiver as it pertains to reinstating Title IV eligibility.

Lender/Servicer: Lender/Servicers should continue to follow HEROES waivers and modifications as they have previously.

Guarantor: None.

U.S. Department of Education: None.

To be completed by the Policy Development and Maintenance Contractor (PDMC)

POLICY CHANGE PROPOSED BY:

The PDMC

DATE SUBMITTED TO POLICY DEVELOPMENT AND MAINTENANCE CONTRACTOR:

September 29, 2017

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

Date Submitted to GB for Approval

PROPOSAL DISTRIBUTED TO:

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

COMMON MANUAL - FEDERAL POLICY PROPOSAL

Date: November 3, 2017

X	DRAFT	Comments Due	11/24/17
	FINAL	Consider at GB meeting	
	APPROVED	With Changes/No Changes	

SUBJECT: Disaster Waivers

AFFECTED SECTIONS: H.4.D Disaster Waivers

POLICY INFORMATION: 1324/Batch 212

EFFECTIVE DATE/TRIGGER EVENT: August 29, 2017

BASIS:
Dear Colleague Letters GEN-17-08 and GEN-17-09.

CURRENT POLICY:
Current policy in Subsection H.4.D provides guidance related to federally declared major disasters that has not been updated since 2010.

REVISED POLICY:
Revisions to Subsection H.4.D will add guidance related to federally declared major disasters issued by the Department in 2017.

REASON FOR CHANGE:
The Department provided updated information regarding the impact of a major disaster on the administration of the Title IV student assistance programs. It supplements all information in the Federal Student Aid Handbook and supersedes guidance included in previous Dear Colleague Letters GEN-10-16, FP-10-06, GEN-05-17, and GEN-04-04.

The Department also provided non-regulatory guidance on flexibility and waivers for grantees and program participants impacted by federally declared disasters in DCL GEN-17-09.

Note on Reorganization: With Governing Board approval, the Policy and Development Maintenance Contractor (PDMC) has undertaken a project to reorganize the Manual to better align it with today's FFELP loan servicing landscape by separating historical content from what is relevant to lenders administering FFELP portfolios and schools dealing with existing FFELP borrowers. The historical content will be placed in a separate Part of the Manual and will no longer be updated, while the relevant text will stay in the main section of the Manual and continue to be updated.

The text in this proposal is impacted by the reorganization plan and is the reason for the addition of two new subheadings, the reformatting of other subheadings, and the rearranging of some text.

PROPOSED LANGUAGE - COMMON MANUAL:

Revise Subsection H.4.D., starting on page 156, by adding new text, updating existing text, adding two new subheadings, reformatting current subheadings (adding numbers and changing to italics) and rearranging text, as follows:

H.4.D Disaster Waivers

In DCL GEN-17-08, the Department provided updated information regarding the impact of a federally declared major disaster on the administration of the Title IV student assistance programs. This guidance applies to all recipients of Title IV aid and their families who at the time of a disaster were residing in, employed in, or attending a school located in a federally declared disaster area in the U.S. and all schools, guaranty agencies, and their servicers located in the federally declared disaster area. This DCL supplements all information in the Federal Student Aid Handbook and supersedes guidance included in previous Dear Colleague Letters, GEN-10-16, FP-10-06, GEN-05-17, and GEN-04-04.

The Department also provided non-regulatory guidance on flexibility and waivers for grantees and program participants impacted by federally declared disasters in DCL GEN-17-09.

A lender or guaranty agency in the Federal Family Education Loan (FFEL) Program should contact its regional Financial Partners representative. A list of regional Financial Partners representatives can be found on the financial partners' portal at <https://fp.ed.gov>.

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Guidance No Longer Applicable to Existing FFELP Loans or Borrowers

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1. *Need Analysis*

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2. *Professional Judgment*

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3. *Verification*

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4. *Recordkeeping Requirements for Schools*

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5. *Disbursement of FFELP Loan Proceeds*

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6. *Credit Balances*

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7. *Satisfactory Academic Progress*

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8. *Enrollment Reporting*

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9. *In-School Period*

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10. *Leave of Absence*

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11. *Institutional Charges and Refunds*

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12. Grant Overpayment Waiver

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Deferment – In-School

~~A loan holder must treat a loan that was in an in-school deferment status on the date disaster conditions interrupted normal operations at a school as if the loan continues in an in-school deferment until such time as the borrower withdraws or re-enrolls at the next regular enrollment period, whichever is earlier. The borrower, a member of the borrower’s family, or another reliable source should notify the loan holder(s) of the borrower’s status. This guidance does not affect the way a school should report a borrower’s enrollment status on its Enrollment Reporting Submittal File (see Section 9.2).~~

Administrative Forbearance

~~A loan holder may grant an administrative forbearance for up to 3 months to a borrower who has been adversely affected by a disaster. The loan holder must provide notice to the borrower allowing the borrower an opportunity to decline the forbearance. See Subsection 11.21.N.~~

13. Other Regulatory Requirements

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Guidance Applicable to Existing FFELP Loans or Borrowers

1. Deferment – In-School

A loan holder must continue to report to NSLDS as “in-schools” the loan status of each borrower who was in an “in-school” status on the date the borrower’s attendance at the school was interrupted due to a disaster. The loan holder must continue the borrower in that loan status until the school reports the borrower as withdrawn or reenrolled in the next enrollment period, whichever is earlier, per the

enrollment reporting requirements in 34 CFR 682.610(c). As part of the non-regulatory guidance provided in DCL GEN-17-09, the Department states the period of non-attendance due to a disaster should not result in a borrower entering or using any of the grace period on the loan.

2. Administrative Forbearance

A loan holder may grant an administrative forbearance for up to 3 months to a borrower who is in repayment and has been adversely affected by a disaster. The loan holder must provide notice to the borrower allowing the borrower an opportunity to decline the forbearance. See Subsection 11.21.N. As part of the non-regulatory guidance provided in DCL GEN-17-09, the Department states that the loan holder must document the reason why the forbearance is granted, but does not need supporting documentation or a signed written statement from the borrower.

3. Satisfactory Repayment Arrangements

During the time a borrower is affected by a disaster, the loan holder must not treat any payment the borrower fails to make as a missed payment in the stream of six consecutive, on-time, voluntary full monthly payments required to re-establish the borrower's eligibility for assistance under Title IV of the HEA. When the borrower is no longer affected by the disaster, the required sequence of qualifying payments may resume at the point at which it was discontinued.

During the time a borrower is affected by a disaster, the loan holder must not treat any payment the borrower fails to make as a missed payment in the stream of three consecutive, on-time, voluntary full monthly payments required to establish eligibility to consolidate a defaulted loan. When the borrower is no longer affected by the disaster, the required sequence of qualifying payments may resume at the point at which it was discontinued.

PROPOSED LANGUAGE - COMMON BULLETIN: Disaster Guidance

The *Common Manual* has been revised to add updated guidance regarding the impact of a federally declared major disaster on the administration of the Title IV student assistance programs. DCL GEN-17-08 supplements all information in the Federal Student Aid Handbook and supersedes guidance included in previous Dear Colleague Letters, GEN-10-16, FP-10-06, GEN-05-17, and GEN-04-04. The *Common Manual* has also been updated to include non-regulatory guidance provided on flexibility and waivers for grantees and program participants impacted by federally declared disasters in DCL GEN-17-09.

GUARANTOR COMMENTS: None.

IMPLICATIONS:

Borrower: Borrower may receive regulatory relief if impacted by a federally declared major disaster.

School: None.

Lender/Service: The lender/service must implement the revised guidance as provided in DCL GEN-17-08 and 17-09.

Guarantor: The guarantor may need to amend program review parameters to include any revised major disaster guidance provided in DCL GEN-17-08 and 17-09.

U.S. Department of Education: None.

To be completed by the Policy Development and Maintenance Contractor (PDMC)

POLICY CHANGE PROPOSED BY:

Policy Development and Maintenance Contractor

DATE SUBMITTED TO POLICY DEVELOPMENT AND MAINTENANCE CONTRACTOR:

September 29, 2017

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

Date Submitted to GB for Approval

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