



Unified Student Loan Policy

**Policy Update Proposals –Action Required
Comments due Friday, October 22, 2021**

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

From: Nancy Masten
Common Manual Policy Development and Maintenance Contractor (PDMC)

Re: *Common Manual* Policy Update
Batch 224: Proposal #1336

Date: October 1, 2021

The PDMC issues **Batch 224** for review and comment.

Policy 1336 is a federal policy proposal and is 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 update and provide written comments by Friday, October 22, 2021 to:

Nancy Masten
Ascendium Education Solutions, Inc.
policy@ascendiumeducation.org

If you have any questions about the enclosed proposal please contact Nancy Masten via phone at 608-733-2581 or via email at policy@ascendiumeducation.org.

Enclosures:

Policy Proposal Transmittal
Common Manual Policy Proposal #1336

Common Manual Policy Proposal Batch 224 Transmittal**October 1, 2021**

#	Subject	Summary of Change to <i>Common Manual</i>	Type of Update	Effective Date
1336	First Name Change	Revised policy allows a lender/servicer to accept 12 types of documentation to support a borrower's request for a first name change or correction.	Federal	For first name changes made on or after July 30, 2021.

Batch 224 (Out for comment)

COMMON MANUAL - FEDERAL POLICY PROPOSAL

Date: October 1, 2021

X	DRAFT	Comments Due	Oct. 22, 2021
	FINAL	Consider at GB meeting	
	APPROVED	With Changes/No Changes	

SUBJECT: First Name Change

AFFECTED SECTIONS: 3.5.F Reporting Social Security Number, Date of Birth, and First Name Changes or Corrections

POLICY INFORMATION: 1336/Batch 224

EFFECTIVE DATE/TRIGGER EVENT: For first name changes made on or after July 30, 2021.

BASIS:
Dear GA Director/CEO letter from Jerry Wallace dated July 30, 2021.

CURRENT POLICY:
Current policy allows a lender/servicer to accept three types of documentation from a borrower for making a first name change.

REVISED POLICY:
Revised policy allows a lender/servicer to accept 12 types of documentation to support a borrower's request for a first name change or correction.

REASON FOR CHANGE:
To align the Manual with the list of acceptable documentation provided by the Department in Dear GA Director/CEO letter dated July 30, 2021.

PROPOSED LANGUAGE - COMMON MANUAL:
Revise subsection 3.5.F, page 17, column 2, subheadings "Acceptable Source Documentation for Reporting a First Name Change" and "Acceptable Source Documents for Reporting the Correction of a First Name", as follows:

Acceptable Source Documents for Reporting a First Name Change or Correction

A guarantor considers any of the following documents a valid source for reporting a first name change or correction:

- Court order or decree.
- Marriage certificate.
- ~~Certificate of Naturalization.~~

~~Acceptable Source Documents for Reporting the Correction of a First Name~~

- Social Security Card.
- Current driver's license.
- Birth certificate.
- State ID.
- U.S. Certificate of Naturalization (Form N-550 or N-570).
- ~~Court order.~~

- ~~Marriage certificate.~~
- ~~W-2 form.~~
- U.S. Passport or passport card (current or expired).
- ~~Unexpired U.S. military ID.~~
- U.S. military discharge papers (Form DD214).
- U.S. Certificate of Citizenship (Form N-560 or N-561).
- Alien Registration Card (Form I-551 or I-151).

PROPOSED LANGUAGE - COMMON BULLETIN:

Acceptable Documentation for First Name Changes or Corrections

The Manual has been updated to align its list of acceptable documentation for making first name changes or corrections with guidance from the Department in Dear GA Director/CEO letter dated July 30, 2021. The guidance states that the Department is allowing guarantors and lenders participating in the FFEL program to align their processes with those used by the Department's federal servicers. The update combines two existing lists into one that contains the 12 types of acceptable documentation that can be used to support a request for a first name change or correction.

GUARANTOR COMMENTS:

None.

IMPLICATIONS:

Borrower: Borrowers will have more documentation options for requesting a change to their first name.

School: None.

Lender/Servicer: Lenders and servicers will be able to accept more types of documentation from borrowers requesting a change to their first name.

Guarantor: None.

U.S. Department of Education: None.

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

POLICY CHANGE PROPOSED BY:

Navient

DATE SUBMITTED TO POLICY DEVELOPMENT AND MAINTENANCE CONTRACTOR:

March 29, 2020

DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:

PROPOSAL DISTRIBUTED TO:

CM Guarantor Designees
Interested Industry Groups and Others