

**Common Manual Policy Proposal Batch 224 Transmittal****November 19, 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 (Approved)

# COMMON MANUAL - FEDERAL POLICY PROPOSAL

Date: November 19, 2021

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	No Change	11/18/2021

**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~~ dDriver'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:**

November 11, 2021

**PROPOSAL DISTRIBUTED TO:**

CM Governing Board  
 CM Guarantor Designees  
 Interested Industry Groups and Others

**Comments Received from:**

NCHER, PHEAA, PPSV, UHEAA, VSAC

**Responses to Comments**

Most commenters supported the proposal as written.

**COMMENT:** One commenter suggested revising the list to remove “current” as a qualifier for Driver’s license and to remove “current or expired” as qualifiers for US passport or Passport Card to mirror ED’s guidance.

**Response:** The PDMC agrees.

**Change:** The list of acceptable sources for making first name changes in subsection 3.5.F is revised to incorporate the commenter’s suggestion.

- ~~Current~~ Driver’s license.
- U.S. Passport or passport card ~~(current or expired)~~.