



COMPLIANCE TIDBIT
By Kim Slote, policy analyst

COMMON MANUAL

The Cooperative Agreement for Guarantors Participating in the *Common Manual* was initially approved Sep. 10, 1995, last amended Aug. 18, 2016. This agreement between guarantors that administer the Federal Family Education Loan Program was for the purpose of publishing a common policy manual to be used as a guide for their schools, lenders, secondary market and servicer clients. For 2016-2017, the *Common Manual* Governing Board has contracted with Great Lakes Higher Education Guaranty Corporation to facilitate the development and adoption of policies that are consistent with the requirements of Title IV of the Higher Education Act of 1965, as amended, applicable regulations and other guidance published by the United States Department of Education. Policy proposals are presented to the *Common Manual* Governing Board for consideration and approval, before being incorporated into the *Common Manual*.

Proposed policy updates and technical edits can be submitted by anyone in the FFELP community. In addition, comments on current proposals are welcomed by GLHEC on behalf of the *Common Manual* Governing Board. Instructions for how to submit comments or to submit policy proposals and technical edits for the *Common Manual* can be found at the following links.

- [Submit Policy Proposals/Tech Edits](#)
- [Submit Comments on Policy Proposals](#)

The *Common Manual* Governing Board approved policy changes proposed in Batch 209 Feb. 16, 2017. Summaries of the most recent policy updates made to the Sep. 2016 reprint of the *Common Manual* will be posted to the *Common Manual* website at the following link <http://www.commonmanual.org> in the [Approved Policies](#) section. The common bulletin language for each policy change drafted by GLHEC is also provided at this link. The common bulletin language is attached to this compliance update, without revision, for your review. Changes made in the proposals will be incorporated into the *Common Manual* annual update. They will also be incorporated into the *Integrated Common Manual*, which is usually updated quarterly.

The nation's guarantors provide the following summaries to inform schools, lenders, and servicers of the latest *Common Manual* policy changes. These changes will appear in the manual's next annual update. These changes will also be incorporated into the Integrated *Common Manual* that comes out after the 60-day hold that was imposed by the Trump Administration on January 20, 2017 has expired. The Integrated *Common Manual* is available on several guarantor websites, and it is also available on the *Common Manual's* website at www.commonmanual.org. Please carefully note the effective date of each policy change.

Death Discharge

The *Common Manual* is being revised to include regulatory changes made to acceptable documentation for loan discharge due to a borrower's or student's death as outlined in the November 1, 2016 *Federal Register*. Effective July 1, 2017, a death claim can be submitted based on one of following:

- An original or certified copy of the death certificate.
- An accurate and complete photocopy of the original or certified copy of the death certificate.
- An accurate and complete original or certified copy of the death certificate that is scanned and submitted electronically or sent by facsimile transmission.
- Verification of the borrower's or student's death through an authoritative Federal or State electronic database approved for use by the Department.

Affected Section(s):	11.21.F Death 11.23.A Death 13.1.D Claim File Documentation 13.1.E Missing Claim File Documentation 13.8.C Death Figure 13-4 Timely Filing Deadlines for Claims and Discharges
Effective Date:	For death discharge applications and claims received on or after July 1, 2017.
Basis:	Final Rule published in November 1, 2016 Federal Register (81 FR 75926); §682.402(b)
Policy Information:	1321/Batch 209
Guarantor Comments:	None.