



COMPLIANCE UPDATE
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 Feb.21, 2002. 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. Members of the *Common Manual* Policy Committee 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 the *Common Manual* Policy Committee. 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 202 April 16, 2015, which was published May 4, 2015. Summaries of the most recent policy update made to the July 2014 reprint of the *Common Manual* have been 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 the *Common Manual* Policy Committee 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 to be released in July 2015. They will also be incorporated into the *Integrated Common Manual*, which is usually updated quarterly.

The nation's guarantors provide the following summary 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* released in August 2014. 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.

Removing Remaining References to Conditional Discharge Period

This change was necessary to eliminate all references to the conditional discharge period for loans discharged for total and permanent disability. No FFELP loans are still monitored under conditional discharge rules. All total and permanent disability discharge applicants are eligible for the post-discharge monitoring period rules for applications received on or after July 1, 2010. The conditional discharge rules are well represented in Appendix H: History of the FFELP and the *Common Manual* for historical reference.

Affected Sections:	5.5.A Prior Loan or TEACH Grant Service Obligation in a Conditional Discharge or Post-Discharge Monitoring Period Based on a Determination of a Total and Permanent Disability Figure 5-1 Effect of Title IV Loan Status on Student Aid Eligibility 11.1.A General Deferment Eligibility Criteria 11.20.F Forbearance of a Loan for a Comaker during the TPD Conditional Period 11.21.S Total and Permanent Disability 13.8.G Total and Permanent Disability
Effective Date:	Total and permanent disability discharge applications received on or after July 1, 2010.
Basis:	§682.402(c); Preamble of the July 23, 2009, <i>Federal Register</i> , Vol. 74, No. 140, pp. 36560-36561.
Policy Information:	1307/Batch 202
Guarantor Comments:	None.