COMMON MANUAL

Unified Student Loan Policy

TO: Jacki Fairbarn, Chair, *Common Manual* Governing Board
                      Governing Board Representatives
                      Industry Participants

FROM: Brenda Grady and Kim Elston
                      Co-Chairs, *Common Manual* Policy Committee

DATE: September 13, 2007

RE: Summary of 2007 Policy Committee Survey Responses

The Policy Committee conducted a survey of FFELP community participants to determine the community's perception of the effectiveness and accessibility of communications between the Committee and community members. Feedback was solicited in the following four areas:

- Policy Proposal and Format
- Policy Committee Communication and Interaction
- *Common Manual* website
- Policy Committee Training Materials and Presentations

Policy Committee Survey Responses
The Committee received 18 responses to the survey: 16 from guarantors and two from the lender/servicers. Most respondents provided answers to all questions, and some provided written comments beyond the "yes/no" responses.

The survey included 14 questions:

- Two addressed the Committee's responses to community comments on proposals;
- One addressed suggestions for improving the effectiveness of working with members of the FFELP community in the context of FFELP initiatives and everyday policy review and development;
- One addressed community access to the Committee;
- One addressed the Committee's distribution of information about policy proposal batches and other Committee activities;
- Five addressed community reaction to the newly launched *Common Manua*l web site, as well as suggestions for documents or resources the industry would like to see on the web site; and
- Three addressed the usefulness of educational tools and programs the Committee provides.

Community Comment Response Process
All respondents confirmed that their comments regarding proposed policy changes were given due consideration by the Committee, and that the comment responses in the final proposals provided a clear understanding of the Committee's rationale for accepting or rejecting suggested changes.

        Policy Committee Response
        The Committee appreciates the community's support regarding the comment response process and will continue to strive to accurately and completely convey the essence of each comment and response. Commenters are encouraged to contact a Committee Co-Chair or a Governing Board member if they believe an issue has not been addressed to their satisfaction.

Suggestions for Improving Policy Committee Effectiveness
Eight of the 18 respondents provided comments when asked how the Committee could improve its effectiveness in working with members of the FFELP community in the context of everyday policy review and development.

➢ Six respondents indicated that the current process works very well, with one commenter also stating that the Committee tries extremely hard to include all members of the FFELP community as part of the policy development and review process.

> **Policy Committee Response**
> The Committee appreciates the positive comments regarding the policy development and review process. The Committee values its open lines of communication with the industry, and will continue working to meet the needs and/or concerns of all manual users in an effective and timely manner.

➢ One respondent felt when the Policy Committee provides its update on the monthly Governing Board calls, it would be helpful if the Committee could advise Board members: how they can submit policy suggestions and proposals to the Committee; and how they can inform the Committee if wordsmith changes are needed to any of the policies submitted for approval.

> **Policy Committee Response**
> The Committee also appreciates the suggestions for improving its effectiveness. The Committee feels that a document can be developed for the Governing Board section of the Web site to provide this type of information to Board members. The Committee will forward this suggestion to the Governing Board for its consideration.

➢ One respondent indicated that the process seems to work well, but provided three suggestions for improving the effectiveness of the Policy Committee. The first suggestion stated that if a policy proposal to update the manual is written based on private letter guidance (or other guidance not readily available), it would be helpful if the referenced guidance was included with the proposal when it goes out for comment. According to the respondent, this would make the review process more efficient and eliminate the need to contact the Committee Chair(s) to obtain a copy of a document. The second suggestion stated that it would be helpful if policy proposals were turned around more expeditiously. The respondent indicated they submit proposals on an infrequent basis, but when they do it takes months to complete the process. The third suggestion was for the Policy Committee to develop a Training Brief that explains the print and production process and why policy review does not occur during the summer months because the respondent feels that the FFELP community does not seem to fully understand the annual process of printing the *Common Manual*.

> **Policy Committee Response**
> It has been the Committee's standard practice not to widely distribute private letter guidance when proposals go out to the community for comment, and to distribute these documents only upon request from a commenter. Many private letters provide guidance beyond what is related to the policy proposal and, therefore, many organizations have indicated in the past that they do not wish to be given copies of all private letters. Commenters may continue to contact the Policy Committee Chair(s) to obtain any additional documentation they feel is needed to provide appropriate comments on policy proposals but at this time the Committee does not believe it is in the best interest of the community participants to amend this policy.
>
> There are times in the annual production schedule when the policies with specific and immediate 'need' are moved to the top of the Committee's development priorities. For instance, last fall's final rules directed the Committee's priorities and required substantial time for development of the policies resulting from those rules. When the 'immediate' needs are completed, the Committee moves to those policies submitted by the

community for development. The process of moving those policies into production follows a specific process for proposal development. This process is outlined in Training Brief, Issue 10: Policy Proposal Development Process Flow. Depending on the scope of the change, some policies take longer to develop than others. Changes that will make a correction or an organizational update to the manual can usually be developed within a shorter time frame, while changes that that are related to guarantor or federal issues (or are pending federal statutory or regulatory changes) usually require more substantive research and may take a longer to develop so that the Committee can ensure it is updating the manual with the most accurate and current policies and procedures. Receiving ideas for changes to the manual's text in a standard format speeds the work of the Committee by allowing it to address the substantive issues and incorporate the proposal into the approval process much more efficiently. This standard format, and accompanying Word template, may be found on the *Common Manual* web site. The Committee sincerely regrets that it cannot move forward each policy proposal immediately, and that this user has experienced delays in the development of the issues it supports.

The annual *Common Manual* is published in July of each year and the Governing Board approves the last batch of policy proposals to update that year's print during its April meeting. The Committee then uses the next few months to set its goals and assign tasks for the coming year, welcomes and orients new members, and also continues researching and developing proposals on its "to do" list. But since the annual update is not yet published, the Committee does not distribute policies that would update and thus, supersede the policies in the as-yet unpublished text. The Committee takes full advantage of the summer months to plan the next year's production and gear up for producing policy proposals essential to maintaining the manual's reputation as the premier resource on common student loan policy. The Committee's monthly Time Line and Update typically go on a short hiatus during the summer, however, these communications are reestablished before the first batch of the new production year is released.

Committee Accessibility and Community Communication

All respondents indicated they believe the Committee is accessible to members of the FFELP community and that suggestions regarding administrative aspects of the Committee's work received ample attention. All respondents also indicated they believe the Timelines for Proposal Development and the Policy Committee Updates provide sufficient information regarding the status of the Committee's work and goals.

Policy Committee Response

The Committee appreciates the feedback and will continue to ensure that it remains accessible to all *Common Manual* users, and that it responds in a timely fashion to all suggestions or questions about its procedures, timelines and goals.

Common Manual Website

Documents and Resources

Eleven survey respondents provided suggestions on other documents or resources they would like to see added to the *Common Manual* Website. Two respondents indicated that at this time, the items currently on the website are sufficient, and two respondents indicated no changes were needed.

➢ Four respondents indicated they would like the website to link to all of the resources that are referenced in the manual or that are included on the eCollection CD-ROM, such as Dear Colleague Letters, the FSA Handbooks, common forms, and Federal regulations, etc.

Policy Committee Response

The Committee is pleased with the positive reaction the new *Common Manual* website has received. Part of the original intent in developing the *Common Manual* website was to not duplicate resources that are readily available via other sites or tools. To include resources such as Dear Colleague Letters, the FSA Handbook, etc. on the website at this time would be duplicating existing industry efforts. Links to these various resources are also contained within the text of the electronic versions of the manual. The Governing Board and Policy Committee will continue their commitment to ensuring that the website is populated with comprehensive, accurate, and timely information as it relates solely to the *Common Manual*, its processes, policies, staff and products.

➢ One respondent indicated that it would be helpful to have access to an archive of previously approved policies organized by year, and another respondent indicated it would be helpful to have access to past versions of the manual.

Policy Committee Response
An archive of approved policies has been added to the website from Batch 134, which was approved by the Governing Board in October 2006, through Batch 141 which was approved in April 2007. Also recently added are archives of past versions of the Electronic *Common Manual* back to 2002, as well as past versions of the Integrated *Common Manual* back to October 2006.

➢ Finally, one respondent asked if it was possible to include on the website, possibly in a members' only section, private letter guidance that related to a policy proposal.

Policy Committee Response
As mentioned in an earlier survey response, it has been the Committee's standard practice not to widely distribute private letter guidance when proposals go out to the community for comment, and to distribute these documents only upon request from a commenter. Many private letters provide guidance beyond what is related to the policy proposal and, therefore, many organizations have indicated in the past that they do not wish to be given copies of full private letters. Commenters may continue to contact the Policy Committee Chair(s) to obtain any additional documentation they feel is needed to provide appropriate comments on policy proposals.

Useful Categories
Seventeen respondents indicated that they have accessed the *Common Manual* website. Twelve of these respondents indicated which areas of the website they found most useful (some respondents indicated more than one answer).
- Five respondents indicated the Review Proposals Out for Comment section is useful.
- Three respondents indicated the Approved Policies section is useful.
- Eleven respondents indicated having the ECM and ICM (current and archived versions) on the website is useful.
- One respondent indicated having the Policy Committee Timelines and Updates on the website is useful.
- One respondent indicated the Training Resources section is useful.
- Two respondents indicated the archives on the website are useful.

Publicizing the Website
Seventeen respondents indicated that their organization publicized the *Common Manual* website to its clients. Twelve of these respondents indicated how the information was publicized and to what audience: six conveyed this information to lenders and schools via a weekly or monthly newsletter; three conveyed the information through training sessions/seminars with lenders and schools; two conveyed this information via e-mail to schools; and one respondent conveyed this information via a staff memo. One respondent indicated they have not publicized the website to its clients.

Providing a Link to the Website
Twelve respondents indicated a link to the *Common Manual* website has been added to their organization's website. Six respondents indicated their organization does not provide a link to the website, one of which indicated their organization links to the NCHELP website for access to the *Common Manual*. Of these six respondents, two indicated that their organization plans to add a link to the *Common Manual* website in the future; two indicated that their organization does not plan to add a link; one indicated their organization may possibly provide a link to the website in the future; and one indicated that it is not known at this time.

General Comments and Suggestions on the Website
Eight respondents provided additional comments or suggestions regarding the website. One respondent indicated that the website is a wonderful addition and is glad to see it as a reality, and another respondent indicated that the work on the website should continue forward. Two respondents indicated no additional comments were needed.

➢ One respondent indicated they would like to see the Blue Book added to the website, as well as to the e-Collection CD-ROM.

> **Policy Committee Response**
> The Committee believes that, at this time, the Blue Book would not be a value-added resource for the website because this document is not directly related to the language contained in the *Common Manual*. The Committee will forward this suggestion to the Governing Board to consider adding this to the e-Collection CD-ROM if space is available.

➢ One respondent suggested using the website to house approved batches for research and maybe setting up a system for referring the language in the manual back to the batch that created it.

> **Policy Committee Response**
> The most recently approved batches are currently housed in the Approved Policies section of the website. Referring the language in the manual back to the batch in which it was approved would require the addition of hundreds of extra footnotes in the manual, and would become very cumbersome to update and difficult for users to follow. Users can utilize the Summary of Changes that is included with each annual version of the manual to locate which batch created a particular language or policy change. The Committee is currently working on a master Summary of Changes document that will compile all past versions into one cohesive, user-friendly document. The Committee is also working with the *Common Manual* administrator on the feasibility of linking footnotes into the ICM to the corresponding batch for that year.

➢ One respondent indicated that it is important that the information on the website is updated in a timely manner and that it is periodically reviewed to make sure the content stays current and that links work, etc.

> **Policy Committee Response**
> The Governing Board and the Policy Committee have worked together over the last year to develop procedures to ensure that the content of the *Common Manual* website is reviewed on a regular basis to ensure that it contains the most current information relating to the manual. This includes confirming the accuracy and viability of hyperlinks, etc.

➢ Finally, one respondent indicated they would like to see the NASFAA presentation *The School Voice in Common Policy* added to the website.

Policy Committee Response
The *Common Manual* presentation, *The School Voice in Common Policy*, that was presented at the 2006 NASFAA Annual Conference is located in the Training Resources section of the website.

Policy Committee Training Materials and Presentations.
Attendance at Common Manual Presentations at NASFAA and NCHELP Conferences
Three respondents indicated that they attended the Policy Committee's *Common Manual* presentation at either the 2006 NASFAA Annual Conference or the 2006 NCHELP Fall Training Conference. One of these respondents suggested the Committee consider including how to navigate the manual and the annual reprint process (including information on the Committee's activities during the summer months) as topics for part of a future presentations. Fourteen respondents indicated that they did not attend either of these presentations, and one did not provide an answer.

Policy Committee Response
The Committee was pleased with the turnout for the *Common Manual* presentations conducted at the NASFAA and NCHELP conferences. We look forward to conducting future presentations at these conferences. The *Cool Tools* presentation that was conducted at the NCHELP conference did include basic instructions on how to navigate an electronic version of the manual, including how to use the search function and activating hyperlinks. The Committee will review this presentation and will consider providing more navigational detail in a future presentation, as well as information on the annual reprint process.

Cool Tools: The Common Manual
Eleven respondents indicated that they have accessed this resource to assist in training on the use of the *Common Manual*. Of those respondents, eight provided additional information about how it was used and audience reception of the material.
- One respondent indicated the presentation was used at a financial aid conference held for schools from Pennsylvania, Delaware, and West Virginia.
- One respondent indicated that they have used the presentation, in whole and in part, during training sessions to answer questions about the manual.
- One respondent indicated they used the presentation to do a *Common Manual* refresher course with staff.
- Two respondents indicated that they have used the presentation for training both internal staff and external clients. One of these two respondents indicated that this presentation is a valuable training tool and suggested the content be transferred onto a neutral PowerPoint template so it can be more easily utilized.
- Two respondents indicated they have reviewed the presentation, but have not utilized it for training purposes yet. One of these respondents indicated that they plan to use the presentation, perhaps with some modifications in the future. One respondent indicated that *Cool Tools* is an excellent presentation and that it received good audience response.

Seven respondents indicated they have not accessed or used the *Cool Tools* presentation.

Policy Committee Response
The Committee is pleased with the community's reaction to the training presentations that it has conducted, and that many view it as a useful resource for training clients and staff. The Committee will work on transferring the content of the *Cool Tools* presentation into a non-specific PowerPoint template so that users do not have to delete the current NCHELP background before using the presentation for their own training purposes.

Tips and Tricks
Eleven respondents indicated they either received a Tips and Tricks handout at a *Common Manual* presentation or have accessed it on the website. Of those eleven respondents, seven provided comments on the value of the handout.

- Three respondents indicated the information provided in the handout was useful. One of these respondents suggested revising the handout to make the footnotes on page 2 more prominent. The respondent indicated that they have found users become frustrated with the slowness of the search feature because they did not see the footnote regarding downloading the file before beginning to use it.
- Four respondents indicated that the Tips and Tricks handout is used frequently amongst staff.
- One respondent indicated it is used when doing a *Common Manual* refresher course with staff.
- One indicated the handout is used during new employee training.
- One indicated that its compliance area refers to the handout when doing research.
- One respondent indicated they keep it handy for daily use.

Policy Committee Response
The Committee appreciates the feedback on the Tips and Tricks handout, and is pleased that many also view this as a useful training resource.

General Comments and Suggestions Regarding Training Initiatives
Four respondents provided additional comments or suggestions regarding the Committee's training initiatives. Three of the four respondents commented that they felt the Policy Committee does a great job and that all the Committee's work is very helpful. One respondent suggested incorporating topics from the Training Briefs into the *Cool Tools* presentation, if they are not already addressed in it.

Policy Committee Response
The Committee appreciates the support and feedback on its educational materials and presentations. The Committee will review its presentations and make any necessary updates, including reviewing past Training Briefs and incorporating this information, as applicable.

Overall, the focus of any future presentations and educational materials developed by the Committee will continue to be on the manual's value as an expedient, "one-stop" compliance research tool for the FFELP community, and educating users on how they can participate in the policy development and comment process. All *Common Manual* presentations, handouts and training tools are available on the *Common Manual* website under Training Resources.

General Comment
One respondent provided a general comment to the survey that indicated the *Common Manual* is not quite as visible as it was in years past, and suggested two ways of increasing the manual's visibility. One suggestion was to increase self-promotion of the *Common Manual* via press releases or Governing Board briefings, etc. The second suggestion was to possibly front-run the more controversial issues with the Department of Education.

Policy Committee Response
The Committee thanks the respondent for its comment and concern regarding the overall visibility of the *Common Manual*. The Committee agrees that the manual should remain a prominent feature within the FFELP community, and that its success as a collaborative effort of FFELP community participants should be noted. However, addressing the issues of the manual's prominence or the ways in which it can be a more dynamic part of the community's interactions does not fall within the purview of the Policy Committee. These issues have been forwarded to the Governing Board for its consideration and for the Board's response to the commenter.

Also, the Committee would like to remind the community that the Policy Committee itself, its members and its chairs, do not work directly with the Department of Education on any issue from their role as Policy Committee members. Any interactions at the federal level are conducted from the perspective of our roles as guarantors. This limitation is maintained at the instruction of the manual's Governing Board and is a steadfast feature of the Committee's function since the Committee's inception in 1995.