



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

FROM: Dan Tryon and J. Carolyn Small  
Co-Chairs, *Common Manual* Policy Committee

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RE: Summary of 2006 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. The survey solicited feedback regarding the usefulness of the information provided in common bulletin language and the timeline and update documents. The survey also requested feedback regarding the effectiveness of the Committee's training, general activities, and the comment process in policy development. With the development of the new *Common Manual* web site, the Committee also requested input from the community as to what information the web site should contain to ensure that it is convenient and useful. The following is a summary of the survey responses.

### **Policy Committee Survey Responses**

The survey included 14 questions: two addressed the Committee's responses to community comments on proposals; two addressed community accessibility to and the responsiveness of the Committee; three addressed the Committee's distribution of information about policy proposal batches and other Committee activities; one addressed the technical edit process; one addressed the usefulness of manual hyperlinks; three addressed the usefulness of educational tools and programs the Committee provides; one addressed suggestions for improving the effectiveness of the Committee's work with members of the FFELP community in the context of FFELP initiatives and everyday policy review and development; and one addressed community expectations and ideas for the use of the *Common Manual* web site.

The Committee received 21 responses to the survey: 16 from guarantors, three from the lender/servicer community, and two from national associations. Most respondents provided answers to all questions, and some provided written comments beyond the "yes/no" responses.

### **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 strong 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 Policy Committee Co-Chair or a Governing Board member if they believe an issue has not been accurately characterized or satisfactorily addressed.

### **Committee Accessibility and Responsiveness to Suggestions**

All commenters responded that they believed the Committee is accessible and that suggestions regarding administrative aspects of the Committee's work received ample attention.

Seventeen commenters responded that questions or comments about the Committee's processes, timelines, goals, and other administrative or procedural issues were addressed in a timely manner. Four did not respond to this question, indicating that they had not posed any questions to the Committee and therefore could not provide a meaningful response.

#### **Policy Committee Response**

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

#### **Committee Communication and Community Interaction**

All commenters responded that they received sufficient information regarding the Committee's activities, and that the regular updates and timelines the Committee distributes provide sufficient information regarding the status of the Committee's work and goals. Nineteen commenters also indicated that "historical data" published in the Policy Committee's timelines and update document is useful. One commenter stated they felt it would be helpful to include in the time line the subject matter of the referenced policies. Another stated that the information about future batches on the Timelines and Update documents is helpful when scheduling time for reviewing proposals, but that they did not utilize the information about previously approved policies or batches.

#### **Policy Committee Response**

The Committee appreciates the positive comments from the respondents regarding communication of its activities and goals. While some of the historical information included in the Timelines document may not be useful on a day-to-day basis and is available on various industry web sites, the favorable response from the commenters indicates that this data continues to be beneficial for many.

The Committee strives to confine this "at-a-glance" summary of policy proposal development throughout the year to a single-page listing of common bulletin distributions, and a concise review of the status of proposals in progress. This historical data summary was developed originally several years ago to address a request the Committee received during a prior year's survey. The Committee has considered the suggestion to add to the Timelines document the subject matter to which each entry refers. After discussions, the Committee believes that the Timelines document would lose its succinctness and therefore, its usefulness would be diminished. In addition, the Committee believes that the accessibility of historical batch information, and timelines and updates in the context of the *Common Manual* website may address the commenter's concern.

#### **Technical Updates**

All commenters agreed that the current procedure of providing the community with periodic requests for input regarding technical corrections and the periodic updates to the Integrated *Common Manual* satisfy the need to identify and correct technical errors in the manual.

#### **Policy Committee Response**

The Committee will continue its current practice of developing lists of technical updates throughout the year for inclusion in various versions of the Integrated *Common Manual*. In addition, the Committee will incorporate into its regular batch distribution notice a reminder that the community is encouraged to submit technical errors to the Committee at any time, as they are identified.

#### **Hyperlinks**

All commenters responded that the electronic manual's hyperlinks are useful. Two commenters added that this was a very good tool and one stated that this truly makes the *Common Manual* a one-stop resource.

### **Policy Committee Response**

The Committee extends its gratitude to the FFELP community for its innovative suggestions and continued support in the creation and updating of the hyperlinks for statutory, regulatory, and other sources of the manual's text.

### **Policy Committee Training and Presentations.**

*Presentations at NASFAA and NCHELP Conferences:* Sixteen commenters out of twenty-one respondents indicated that they had not attended the Policy Committee's *Common Manual* presentation at either the NASFAA summer or NCHELP Fall Training conferences in 2005 and 2006. Of those who responded that they had attended at least one of these sessions, four provided additional comments regarding the portion of the presentation that was most informative or helpful: one commenter stated that the entire presentation was very helpful; another felt that learning about the various tools available to them on the Internet was an asset; a third felt the most helpful feature of the presentation was the hands-on demonstration showing attendees how to quickly find an answer to questions using the search capabilities. One commenter stated that it was surprising to learn that so few schools understood how to utilize the e-Collection or the school's ability to play a role in policy development.

*Common Manual as a Resource – "Cool Tool:"* Ten commenters indicated that they have accessed this resource (posted on the NCHELP web site) to assist in training on the use of the *Common Manual*. Of those ten respondents, nine provided additional information about how it was used and audience reception of the material. Seven commenters indicated it was used for in-house training, and/or at industry-related meetings, and indicated that it was very well received. Two commenters specifically noted that the presentation was used as a resource for information before asking questions of their Program Policy/Compliance Department. Two commenters indicated that there was some difficulty locating the presentation on the NCHELP website.

*Tips and Tricks:* Twelve commenters indicated that they received or accessed the handout Tips and Tricks at *Common Manual* presentations or on the NCHELP web site. Of those twelve respondents, ten provided additional information about its value. Nine commenters indicated they had used Tips and Tricks as a handout for in-house training, association, and school meetings. These commenters described it as a handy reference that covers the basics needed to navigate the manual, and stated that they used it during regulatory research to answer policy questions on a recurring basis. Several commenters indicated that the document is routinely disseminated to customers. One respondent stated that the use of the *Common Manual* tools is now intuitive to their internal staff.

### **Policy Committee Response**

The Committee appreciates the respondents' overall support for the Committee's educational materials and presentations.

Based on survey responses and other attendee feedback received during the Committee's presentations at both NASFAA and NCHELP, the Committee agrees in particular with the commenter who noted that demonstrating the use of manual search capabilities to locate answers to policy and compliance questions is a valuable presentation segment. Generally, the Committee will continue to focus its presentations and educational materials on the manual's value as an expedient, "one-stop" compliance research tool for the FFELP community, and continue to educate users about participating in the policy development and comment process. All *Common Manual* presentations, handouts and training tools will be available on the new *Common Manual* website.

### **Suggestions for Improving Policy Committee Effectiveness**

Six of twenty-one respondents provided comments when asked how the Committee could improve its effectiveness in working with members of the FFELP community in the context of FFELP initiatives, and in the context of everyday policy review and development.

Five of the commenters provided positive feedback to the Committee, praising the Committee's efforts to solicit the FFELP community's involvement in policy development and providing the opportunity for industry workgroups and experts in the development of controversial or complex policy issues and encouraged the utilization of these resources.

One commenter felt the Committee should more proactively solicit input from the school community and recommended that the Committee form a national school advisory team (comprised of financial aid administrators) that would review school-related proposals from each batch. The commenter suggested that this team could consist of rotating volunteers solicited through NASFAA and stressed the concern for more school input from the "front lines."

### **Policy Committee Response**

The Committee appreciates the positive comments indicating that the policy development process is working well and that the Committee is meeting user's needs. In no small part, improvements made in recent years result from suggestions the FFELP community provided to the Policy Committee and Governing Board through forums such as the Policy Committee survey, annual industry meetings with the manual's users, and the expertise provided from industry experts. The Committee will strive to maintain a cordial, open line of communication with all manual users to ensure that needs and concerns are identified and addressed timely.

The Committee understands and agrees with the commenter's concern that there is not as much participation from school clients in the area of policy development as may be seen among the lender/servicer community. However, the scope of the Committee's ability to form and manage a national advisory committee is limited. Further, the Committee believes it is inappropriate for the Policy Committee to reach out to form a committee that would duplicate or, worse, conflict with other such endeavors by participating FFELP guarantors. The express authority of the Policy Committee is to develop common policy and to educate and train on the use of the *Common Manual* and the policy development process. As such, the Committee's role is to encourage clients and the existing industry organizations that represent those clients to take this initiative themselves. The Committee believes it fulfills its responsibilities with the training it provides via Training Briefs and its presentations at appropriate conferences. However, in response to this repeated concern, the Policy Committee will again bring the issue to the Governing Board and provide specific recommendations to the Board for increasing school access to and participation in the common policy development process.

### **Common Manual Website**

Twenty of twenty-one respondents provided categories of information that they anticipated would be most useful to them when accessing the new *Common Manual* website. Most commenters indicated that the current *Integrated Common Manual* and e-Collection, as well as current batches in process and archives of past batches would be most useful. Two stated that all of the items listed in the survey would be useful. Three other commenters stated that they would most often access the updates and timelines. One commenter stated that the contact information for key *Common Manual* staff would be most useful.

Thirteen commenters provided suggestions for other *Common Manual* documents or resources that may be useful if provided on the website. Most of the commenters stated that *Common Manual* presentations, *Common Manual* as a Resource – Cool Tool, the Tips and Tricks handout, and Training Briefs would be very useful on the website. Three stated they would like to see the current batches in process, and a history of all proposals approved by the Governing Board. Two others would like to see a list of the policies considered but not developed. Two more commenters felt links to NCHELP, IFAP and other industry resources, such as those on the e-Collection would be very useful tools. Two respondents stated they would like to see old versions of the manual available for historical research. Several individual responses suggested that the site include the NCHELP topical index, the *Common Manual* Cooperative Agreement, the *Common Manual* Language Conventions Guide, *Common Manual* surveys, and minutes from industry meetings. One commenter stated that having all the manual's chapters on the website would be sufficient. Several other commenters suggested that useful content might include information on how to submit a policy proposal; an overview of how the *Common Manual* process works,

including Governing Board and Policy Committee responsibilities; technical edits submission information; news about upcoming events (like the Industry Face-to-Face); the latest version of federal regulations and HEA language; a separate section summarizing HERA changes; the various *Common Manual* presentations, including “Cool Tools”; and information on how to subscribe to the *Common Manual* list serve. Two commenters also noted that the website process should include maintenance procedures that ensure that the materials on the site are current and “fresh,” including confirming the accuracy and viability of hyperlinks, etc.

#### **Policy Committee Response**

The Committee appreciates the community’s input into the developing *Common Manual* website. This input will be forwarded to the website committee and will help ensure the development of a website that will be convenient and useful. To the extent possible, the *Common Manual* website will not duplicate the resources already readily available via other sites or tools. But for content that relates solely to the *Common Manual*, its processes, policies, staff and product, the *Common Manual* Governing Board and Policy Committee are committed to ensuring that the site is populated with comprehensive, accurate, and timely information.