

**Deliverable 147.1.2 Financial Partners Eligibility and Oversight As-Is Flows Comments Tracker (FORMAL COMMENTS)**

ID #	Section	Page #	Comment	Author	Status	Notes
1	Section 2.4.1 Federal Agency Enrollment Overview	53	Borrower Services (referred to as the "Collections Group") also interacts with the U. S. Postal Service to acquire address updates for borrowers via the Address Change Service. Additionally, Borrower Services interacts with the U. S. Department of Justice to litigate defaulted student loan accounts.	Steve Martus	Change to Deliverable Text	Included comment further elaborating that the Collections Group interacts with U.S. Postal Service to acquire address updates for borrowers via the Address Change Service and U.S. Department of Justice to litigate defaulted student loan accounts.
2	Section 2.11 Federal Family Education Loans Collections	101	The claim payment process for FISL loans differs from that for Stafford loans. FSA directly receives, reviews, approves, and pays FISL Claims to lenders whereas Guaranty Agencies receive, review, approve and pay Stafford claims to lenders. Notwithstanding that FISLs are no longer disbursed, the distinction between two claim processes should be more clearly stressed, especially since FSA still pays FISL Claims and subsequently services those loans.	Steve Martus	Change to Deliverable Text	Text revised to reflect this comment.
3	2.12 FFEL Reporting	108	Step 1 should say "at least quarterly" not "at least monthly."	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
4	2.12 FFEL Reporting	108	Step 2 - spell out FSA as "Department of Education's (ED) Office of Federal Student Aid (FSA)."	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
5	2.5 Audit and Program Reviews	54	The word lender in the title should be capitalized.	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
6	2.5 Audit and Program Reviews	55	Steps 5-9 - OIG should be singular.	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
7	2.13 FFEL Enrollment Reporting	112	The first mention of the acronym GA should be in parenthesis (first paragraph), the second mention of NSLDS should not be spelled out. "with a 60 day period" should be "within a 60 day period" in paragraph 2, "GAs will communicate these updates to the lender" should be "GAs communicate..."	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
8	2.11 FFEL Collections	102	Steps 18 to 19 - change wording to say that subrogation usually occurs in the third or fourth quarter of the fiscal year. Steps 24 to 25 - change third party servicer to "secondary market"	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
9	2.10 DL and FFEL Consolidation	89	Opening paragraph change "DL" to "FDLP" and spell out Federal Direct Loan Program	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.

Formal Comments

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10	2.6 LEAP/SLEAP	77	Paragraph 2 should read as follows: "A state agency must submit an application to FSA <b>annually</b> to receive LEAP/SLEAP funds <b>for the upcoming award year</b> . Upon approval from FSA, they receive an allocated amount which will then be disbursed to students via centralized or decentralized administration. In centralized administration, a state agency <b>receives and processes student applications, notifies students of awards, verifies attendance, makes disbursements and keeps complete records on all student awards</b> . determines student eligibility and how much of the funds are disbursed to each student applicant. A state agency may leave <b>the processing of student information up</b> to the discretion."	Greg Gerrans	Change to Deliverable Text	Added the bolded text to the deliverable.
11	2.6 LEAP/SLEAP	77	Paragraph 2 should read as follows: In the case of centralized administration, a state agency processes the forms and determines student eligibility, <b>whereas, in a decentralized administration the schools give the state agency the information needed for formal approval of individual student awards.</b>	Greg Gerrans	Change to Deliverable Text	Added the bolded text to the deliverable.
12	2.6 LEAP/SLEAP	77	Paragraph 2 should read as follows: <b>Annually, FSA establishes a deadline date by which states shall submit</b> the LEAP/SLEAP application form 1288 to FP Services to <b>apply for funding and participate in</b> the programs. ... At this point, if an extension has not been granted, the state agency is notified via email or phone call that <b>they haven't received an application and that without a submitted application the state will not be considered for funding.</b>	Greg Gerrans	Change to Deliverable Text	Added the bolded text to the deliverable.
13	2.6 LEAP/SLEAP	78	Steps 5-7: If these issues cannot be addressed, the state agency receives an email stating the reasons for ineligibility and subsequently a <b>denial letter is sent to the state.</b>	Greg Gerrans	Change to Deliverable Text	Added the bolded text to the deliverable.
14	2.6 LEAP/SLEAP	78	Steps 12 to 14: ...FP Services will inquire as to <b>if these funds will be used during the remainder of the award year for which they were granted. If a state notifies or otherwise indicates that it will be unable to use a portion of its award, this portion is then deobligated by FP Services via GAPS. For those states that have already drawn down their funds, they would then submit funds</b> they do not plan to utilize or are incapable of matching back to FSA either electronically <b>via GAPS</b> or, in rare cases, via cash. All funds submitted back to FSA are then reallocated to other state agencies based on the <b>LEAP</b> Formula Grant Calculation.	Greg Gerrans	Change to Deliverable Text	Added the bolded text to the deliverable.
15	2.3 Private Collection Agency Participation	50	Retitle process from "Private Collection Agency Enrollment" to "Private Collection Agency Participation"	S. Wheeler	Change to Deliverable Text	Text revised to reflect this comment.
16	2.4 Federal Agency Participation	53	Retitle process from "Federal Agency Enrollment" to "Federal Agency Participation"	S. Wheeler	Change to Deliverable Text	Text revised to reflect this comment.
17	2.4 Federal Agency Participation	53	Remove reference to MOU as a Federal mandate. Changed MOU to DCIA as mandate for TOP participation.	S. Wheeler	Change to Deliverable Text	Text revised to reflect this comment.

Formal Comments

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18	2.5.1 Audit and Program Review Processes for Lenders and Gas	53	The first sentence refers to "Contingency 401 (c) (1)" for program reviews. What is this? (I'm assuming it is a regulatory citation.) We might like to reference the GA's "Top 10 / 2%"	S. Ferraiole	See Notes Column	This is referring to ED's regulation 682.410(c)(1) as listed below: (c) Enforcement requirements. A guaranty agency shall take such measures and establish such controls as are necessary to ensure its vigorous enforcement of all Federal, State, and guaranty agency requirements, including agreements, applicable to its loan guarantee program, including, at a minimum, the following: (1) Conducting comprehensive biennial on-site program reviews, using statistically valid techniques to calculate liabilities to the Secretary that each review indicates may exist, of at least-- (i)(A) Each participating lender whose dollar volume of FFEL loans made or held by the lender and guaranteed by the agency in the preceding year-- (1) Equaled or exceeded two percent of the total of all loans guaranteed in that year by the agency; (2) Was one of the ten largest lenders whose loans were guaranteed in that year by the agency; or (3) Equaled or exceeded \$10 million in the most recent fiscal year;
19	2.4 Federal Agency Participation	55	Steps 10 to 17: the first sentence discusses the entry of the program review into PEPS. We have requested that this be done BEFORE the review is completed -- when it is scheduled or as far in advance as possible. This helps others scheduling a review to know before hand when a review will be conducted. This information should also be updated on the corresponding flowcharts and process documentation.	S. Ferraiole	See Notes Column	The information in the as-is flows reflects what we have documented during the client meetings. Our goal is to capture the process as it currently happens versus how it should happen.
20	2.5.4 Lender/GA Program Reviews Conducted by FP Services Overview	60	In the second paragraph it discusses desk reviews. It alludes to these being conducted electronically on a specific issue -- narrow in scope. That isn't necessarily the norm. In many cases, we ask lenders to ship paperwork to us and conduct a full-blown review with a full scope. These might be close-outs or portfolios under \$100k. We might want to revise that a bit.	S. Ferraiole	Change to Deliverable Text	Text revised to reflect this comment.
21	2.5.4 Lender/GA Program Reviews Conducted by FP Services Overview	60	Item 2.5.4, the listing of review types, #2 is "limited scope." I think "focused" is a better term.	S. Ferraiole	Change to Deliverable Text	Text revised to reflect this comment.
22	2.5.4 Lender/GA Program Reviews Conducted by FP Services Overview	64	In the process flow discussion, the second process involving PEPS is listed as "annually" updated. To what is this referencing? I don't think the timeframe is correct here. In addition, it appears that all timeframes are listed as "annually" -- this would not be accurate.	S. Ferraiole	See Notes Column	Because the frequency of the program review is annual, we meant for this PEPS process to occur once for an annual program review.

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23	2.10.2 DL Consolidation Process Flow	93	Steps 2 and 3: We might want to have someone more learned in our policy implementation take a look at those statements. For this purpose, though, a change to that process might not impact FSA (Financial Partners) other than giving us another piece of reviewable data.	S. Ferraiole	Change to Deliverable Text	Information was added to the overview paragraph for the section, stating: "The consolidation of Direct Loans into FFEL Consolidation loans in an industry practice not necessarily supported by regulation or statute. At the very minimum a FFEL lender cannot consolidate direct loans for a borrower unless it is the holder of one of the borrower's FFEL loans. In these two consolidation scenarios, the underlying loan holder must provide information to the consolidation lender and vice versa. As such, there is interaction between FSA and financial partners."
24	2.5 Audit and Program Reviews	54	In the review portion, the drafted "Lender Review Guide" is not mentioned very clearly. Would it be helpful to mention that this is the basis for the structure of all comprehensive lender and servicer reviews?	S. Ferraiole	Change to Deliverable Text	Text revised to reflect this comment.
25	2.5.4 Lender/GA Program Reviews Conducted by FP Services Overview	60	This document lists 5 types of on-site GA reviews. I suggest that VFA reviews need to be added as a separate category.	R. Russo	Change to Deliverable Text	Text revised to reflect this comment.
26	2.5.4 Lender/GA Program Reviews Conducted by FP Services Overview	60	This document lists 3 types of on-site lender reviews (I assume that this also includes servicers and secondary markets). I suggest that Exceptional Performer Reviews and CRI Reviews also be added as separate categories. Occasionally the IG refers QC reviews to the Regions, so you may want to consider adding these also. There may also be a need in the future to add Exceptional Performer reviews to the GA categories, assuming any GA apply for and are granted EP status.	R. Russo	Change to Deliverable Text	Text revised to reflect this comment.
27	2.1 Lender Enrollment	35	Paragraph 2 should read as follows: ... creates a lender ID (LID), and e-mails (ref 2.1.2 step 4) to the lender.	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
28	2.1 Lender Enrollment	35	Paragraph 3 should read as follows: Prospective lenders use the LAP form to complete... ..or mail the completed form to FSA. (Ref 2.1.2 step 7) Once the form is submitted, it is converted to read-only. Upon approval to FSA CFO, the data is converted into LaRS. ...	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
29	2.1 Lender Enrollment	35	Paragraph 4 should read as follows: ...(delete Financial Partner (FP) Services) FMS requires the submission of the OPA and the LaRS/FMS security form before...	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
30	2.1 Lender Enrollment	36	Steps 1 to 4: Deleted 'FP Services' twice in third sentence. Deleted "sends and email notifying FSA CFO of the duplicate, and contains the lender to rectify the discrepancies." Last sentence to read, "...TIN does not exist, FSA CFO creates the LID and an e-mail is automatically generated to the lender..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.

Formal Comments

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31	2.1 Lender Enrollment	36	Step 5: Deleted "FP Services" twice when came after FSA CFO. Also deleted in last sentence, "If the lender's information is accepted, FSA CFO receives and approval notification from FP Services."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
32	2.1 Lender Enrollment	36	Steps 10 to 11: Deleted sentences that say "FSA CFO representative manually... ..eight-digit Office of Postsecondary Education ID (OPEID)."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
33	2.1 Lender Enrollment	36	Step 12: Deleted sentences that say, "To start the enrollment process... ..need to access."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
34	2.1 Lender Enrollment	37	Enrollment Updates: In the first sentence, deleted "paper or web." Third sentence to read, "Otherwise the lender can update FMS independent of contacting FSA." Deleted fourth and fifth sentences.	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
35	2.1.3 Lender Enrollment Data Exchange Table	39	Third row, third column: Deleted "After creating the LID, the FSA CFO representative manually enters the LID into FMS."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
36	2.1.3 Lender Enrollment Data Exchange Table	39	Fifth row, third column: Deleted "Notification"	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
37	2.2 Guaranty Agency Enrollment	42	Second paragraph, second sentence should read "...Secretary of Education's office and completion of the participation..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
38	2.4 Federal Agency Participation	53	Deleted "inactivations" in the second paragraph, fifth sentence.	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
39	2.9 FFEL Transfers	88	Second paragraph should read "...FFEL to another lender or a secondary market. If the loan is sold, the subsequent lender..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
40	2.10 DL and FFEL Consolidation	89	Second paragraph, fourth sentence should read: "...note either online or by paper to the Department..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
41	2.10 DL and FFEL Consolidation	89	Third paragraph, last sentence should read: "...updated to "Paid in full through consolidation."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
42	2.14 Lender Payment Processing	116	Fourth paragraph, last sentence should read: "ED pays special allowance on a loan..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
43	2.14 Lender Payment Processing	116	Fifth paragraph should read, "...federal reinsurance. It is... ..special allowance on a loan that... ..claim filing or failure to perform due diligence..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.

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44	2.14 Lender Payment Processing	117	Steps 1 to 2: First paragraph should read "...the lender bills ED for special allowance."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
45	2.14 Lender Payment Processing	117	Steps 9 to 12: Should read: "The lender submits their payment via check..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
46	Appendix A	136	Accounts Payable (AP) deleted "on account."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
47	Appendix A	136	Accounts Receivable (AR) deleted "on account."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
48	Appendix A	141	Lender Reporting System (LaRS) change definition to "...Request and Report to the Department..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
49	Appendix A	141	Lender Identifier (LID) deleted "for transactions with FSA."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
50	Appendix A	141	Memorandum of Understanding (MOU) deleted first sentence reading: "...A Memorandum... specific programs."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
51	Appendix A	142	Organization Participation Agreement (OPA) changed definition to read, "...allows the lender to electronically exchange lender portfolio data with..."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.
52	Appendix A	143	Student Loan marketing Association (SLMA) deleted first sentence reading: "...An association... other Financial Partners."	A. Roca-Baker	Change to Deliverable Text	Text revised to reflect this comment.

**Deliverable 147.1.2 Financial Partners Eligibility and Oversight As-Is Flows Comments Tracker (COMMENTS FROM REQUIREMENTS MEETINGS)**

ID #	Section	Page #	Comment	Author	Status	Notes
1	2.2 Guaranty Enrollment	37-44	<p>During the As-Is documentation client meetings, the point that a participation agreement form was signed with the Office of the Secretary of Education was not discussed. The only agreement form mentioned was the OPA, and it was said to be signed with FP Services.</p> <p>It was stressed during the Requirements Gathering meetings that FP Services was responsible for setting up a new GA into FMS; this notion contradicts the information gathered during the As-Is documentation meetings that FSA CFO was responsible for setting up a GA into FMS.</p>	Pam Eliadis Conflicting with Frank Ramos	Change to Deliverable Text	<p>Updated the GA Enrollment section with the following:</p> <p>- A participation agreement form needs to be signed and retained with the Office of the Secretary of Education (Program Related) that an OPA needed to be signed with FP services (Access Related).</p>
2	2.2.2 Guaranty Enrollment As-Is Flows	40	Add a step to the flow to reflect that the GA completes an OPA with Secretary of Education.	Pam Eliadis and Linda Elrod	Change to Deliverable Text	Added step 3 to process flow - GA completes OPA with Secretary of Education. Change reflected in the narrative.
3	2.2.2 Guaranty Enrollment As-Is Flows	40	Add a step to the flow to reflect that the GA completes NSLDS online training.	Pam Eliadis	Change to Deliverable Text	Added step 22 to process flow - GA completes NSLDS online training. Change reflected in the narrative.
4	2.2.2 Guaranty Enrollment As-Is Flows	40	The 'Other Enrollment' process can be performed concurrently with the SAIG and Title IV enrollment.	Pam Eliadis	Change to Deliverable Text	Deleted the line joining step 23 to step 24 in the process flow.
5	2.1.2 Lender Enrollment As-Is Flows	33	Add a step to the flow indicating that FSA CFO personnel communicates denial reasons to lender.	Angela Roca-Baker	Change to Deliverable Text	Added step 8 to the process flow - FSA CFO personnel communicates denial reasons to lender. Change reflected in the narrative.
6	2.1.2 Lender Enrollment As-Is Flows	33	Add a step to the flow to reflect that the lender completes NSLDS online training.	Pam Eliadis	Change to Deliverable Text	Added step 22 to the flow - Lender completes NSLDS online training. Change reflected in the narrative.
7	2.1.2 Lender Enrollment As-Is Flows	33	Delete the line joining step 23 to step 24.	Pam Eliadis	Change to Deliverable Text	Change made to the process flow and reflected in the narrative.

Comments from Requirements Meeting

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8	2.1.2 Lender Enrollment As-Is Flows	33	The lender does not submit the LAP with demographic and financial information to FMS.	Angela Roca-Baker	Change to Deliverable Text	Removed the following from step 7 of the flow - Lender submits LAP with demographic and financial information to FMS. Change made to the process flow and reflected in the narrative.
9	2.1.2 Lender Enrollment As-Is Flows	33	Add the following text to step 12 of the flow - Lender submits LAP to FSA CFO channel.	Angela Roca-Baker	Change to Deliverable Text	Changes made to the process flow and reflected in the narrative.
10	2.1.2 Lender Enrollment As-Is Flows	33	Removed the following from the first step under Post Enrollment Updates for Title IV: Lender accesses LaRS online through the FMS website.	Angela Roca-Baker	Change to Deliverable Text	Changes made to the process flow and reflected in the narrative.
11	2.1.2 Lender Enrollment As-Is Flows	33	Change the text in the first step under Post enrollment update for Title IV to Lender sends FSA personnel demographic updates.	Angela Roca-Baker	Change to Deliverable Text	Changes made to the process flow and reflected in the narrative.
12	2.1.2 Lender Enrollment As-Is Flows	33	Remove the following from the second step under Post Enrollment Updates for Title IV: Lender updates demographic in LaRS and submits to FM.	Angela Roca-Baker	Change to Deliverable Text	Changes made to the process flow and reflected in the narrative.
13	2.1.2 Lender Enrollment As-Is Flows	33	Add the following to the second step under Post Enrollment Updates for Title IV: FSA CFO personnel updates LaRS.	Angela Roca-Baker	Change to Deliverable Text	Changes made to the process flow and reflected in the narrative.
14	2.16 CDR As-Is flow	127	In step 1 of the process flow, note that CDRs are also manually forwarded to FP Services	Pam Eliadis and Katrina Turner	Change to Deliverable Text	This phrase was added to step 1.
15	2.16 CDR As-Is flow	127	In step 6 of the process flow, note that lenders and GAs are able to see their rates online, but not all of them do.	Pam Eliadis and Katrina Turner	Change to Deliverable Text	Instead of saying that lenders and GAs view their rates online, the language now reads they have the capability to view rates online.
16	2.16 CDR As-Is flow	127	In step 8 -- They do not always use a specific percentage number to compare CDRs. It is usually determined whether or not it is significant based on current circumstances.	Pam Eliadis and Katrina Turner	Change to Deliverable Text	Replaced the text '1-2%' with the word 'significant'.
17	2.16 CDR As-Is flow	127	In step 12 -- The official rates are not always calculated in August, this can happen anywhere within July or August.	Pam Eliadis and Katrina Turner	Change to Deliverable Text	The text in the step now reads "...calculated in July/August..."

Comments from Requirements Meeting

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18	2.12 FFEL Reporting	104	In the process flow, there needs to be a step indicating that GAs run edit checks on lender FFEL data submitted.	Pam Eliadis	Change to Deliverable Text	Added step 2 for this process step
19	2.15 GA Payment Processing	121	In the GA Lender Payment Processing Process Flow, replace Financial Partners with FSA CFO where appropriate.	Sandra Simmons and Barbara Johnson	Change to Deliverable Text	This replacement was made throughout the process flow.
20	2.15 GA Payment Processing	121	In the GA Lender Payment Processing Process Flow, make a change to reflect that e-mails are sent to FSA CFO Accounting (GAR) group and GA.	Sandra Simmons and Barbara Johnson	Change to Deliverable Text	Updated steps 8 and 15 per the comment.
21	2.15 GA Payment Processing	121	In the GA Lender Payment Processing Process Flow, step 28 needs to be connected to step 5 and not to the step 11 (After GA submits GAFR via file transfer FSA CFO must review the form and accepted it before the data from the form is uploaded to the appropriate accounting modules.)	Sandra Simmons and Barbara Johnson	Change to Deliverable Text	Updated step 28 to be connected with step 5.
22	2.15 GA Payment Processing	121	In the GA Lender Payment Processing Process Flow section that depicts calculation of AMF and LPIF, step 30 should be rewritten to say: "NSLDS calculates the outstanding principal balance for open loans."	Pam Eliadis	Change to Deliverable Text	Updated step 30 per the comment.
23	2.15 GA Payment Processing	121	In the GA Lender Payment Processing Process Flow section that depicts calculation of AMF and LPIF, step 31 should include the following comment: "NSLDS stores loan level detail data and summary level detail data by loan type. This information is stored for audit purposes."	Pam Eliadis	Change to Deliverable Text	Updated step 31 per the comment.
24	2.15 GA Payment Processing	121	In the GA Lender Payment Processing Process Flow section that depicts calculation of AMF and LPIF, step 33 should be rewritten to say: "FMS calculates fees based on the summarized detailed data received from NSLDS."	Pam Eliadis	Change to Deliverable Text	Updated step 33 per the comment.
25	2.5.1-2.3.3 Lender Program Reviews Conducted by Guaranty Agency	49-53	A line should be added to join the billing offset step (step 18) to the findings entry into PEPS (step 22).	Linda Elrod	Change to Deliverable Text	Updated steps 18 and 22 per the comment.

Comments from Requirements Meeting

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26	2.5.1-2.3.3 Lender Program Reviews Conducted by Guaranty Agency	49-53	The following comment should be added to step 21: "liabilities remitted by check".	Linda Elrod	Change to Deliverable Text	Updated step 21 per the comment.
27	2.5.1-2.3.3 Lender Program Reviews Conducted by Guaranty Agency	49-53	Step 24 should be updated to indicate GA performing PEPS entry.	Linda Elrod	Change to Deliverable Text	Updated step 24 per the comment.
28	2.5.4-2.3.6 Lender/GA Program Reviews Conducted by Financial Partner Services	55-58	Step 18 should be updated to include the fact that a copy of the Program Review Report is sent to all Regional Offices.	Linda Elrod	Change to Deliverable Text	Updated step 18 per the comment.
29	2.5.4-2.3.6 Lender/GA Program Reviews Conducted by Financial Partner Services	55-58	Step 25 should be updated to indicate that Formal Appeal can go to DC office as well.	Linda Elrod	Change to Deliverable Text	Updated step 25 per the comment.
30	2.5.7-2.5.9 Lender Annual Compliance Audit	61-64	Beginning of process altered to begin with generation of a tracking file and generation of missing audits letters (step 1-step 9). FP Services Regional Office involvement in follow-up process is noted (step 20). Suspension letter added for unresolved findings (step 25). If no findings, PEPS data is entered and no letter is sent to the lender (step 14 goes into step 26 instead of 24).	Nettie Harding	Change to Deliverable Text	Updates made to audit process per the comments.
31	2.5.10-2.5.12 Guaranty Agency Annual Compliance Audit	66-69	Step added for drafting of Full Resolution letter (step 11). If no findings, PEPS data is entered and no letter is sent to the lender (step 8 goes into step 17 instead of 16).	Nettie Harding	Change to Deliverable Text	Updates made to audit process per the comments.

Comments from Requirements Meeting

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32	2.6 LEAP/SLEAP Award Origination and Disbursement	71-77	Removed use of reallocation form from process flow, data exchange table and narrative. During the LEAP/SLEAP Requirements meeting for Deliverable 147.1.3 on 2/19/04, it was mentioned that a Reallocation form is not used by state agencies when they resubmit funds to FP Services.	Greg Gerrans	Change to Deliverable Text	Updates made to LEAP/SLEAP process per the comments.
33	2.12 FFEL Reporting	102	Third-party servicers can submit data on behalf of Lenders and GAs.	Pam Eliadis	Change to Deliverable Text	Text revised to reflect this comment.
34	2.12 FFEL Reporting	102	The following paragraph should be added: "FP Services personnel track the submission of the FFEL information by the GAs. Although regulation states that GAs must complete FFEL Reporting at least monthly, GAs can set their submission schedules with NSLDS and choose to submit FFEL data more frequently. If GAs do not submit in accordance with this schedule, FP services contacts them. Monthly, NSLDS provides GAs with a benchmark report that informs GAs of errors that occurred during their submissions; this information is also available to GAs online."	Pam Eliadis	Change to Deliverable Text	Text revised to reflect this comment.
35	2.12 FFEL Reporting	102	Lenders are required to submit quarterly, but some submit more frequently. GAs are required to submit monthly, but some submit more frequently.	Pam Eliadis	Change to Deliverable Text	Text revised to reflect this comment.
36	2.12 FFEL Reporting	104	There should be a step (step 2) on the process flow diagram to capture the edits GAs run on FFEL data submitted by Lenders.	Pam Eliadis, Martha Shine, Leslie Richards, Mercedes Zajilek, Linda Elrod	Change to Deliverable Text	Text revised to reflect this comment.
37	2.12 FFEL Reporting	104	There should be an arrow from step 8 to step 9 (formerly step 7 and step 8) on the process flow diagram. The endpoint after step 8 (formerly step 7) should be removed.	Pam Eliadis	Change to Deliverable Text	Text revised to reflect this comment.

Comments from Requirements Meeting

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38	2.13 FFEL Enrollment Reporting	106	Text should be added for steps 4 to 7: Change wording from "a warning letter" to "a series of warning letters". Add "Warning letters are not sent to third-party servicers reporting on behalf of a school. When a school uses a servicer to perform Enrollment Reporting, the school is ultimately responsible that the information is reported in an accurate and timely manner."	Pam Eliadis, Martha Shine, Leslie Richards, Mercedes Zajilek, Linda Elrod	Change to Deliverable Text	Text revised to reflect this comment.
39	2.13 FFEL Enrollment Reporting	106	Text should be added for steps 13 to 15: "GAs are required to report this information to lenders quarterly, but many report more frequently (i.e., weekly). Lenders use enrollment information received from GAs to determine when a borrower's repayment process should begin." Frequency in data exchange table should be updated accordingly.	Pam Eliadis	Change to Deliverable Text	Text revised to reflect this comment.
40	2.13 FFEL Enrollment Reporting	109	Last row in the data exchange table should be removed. It was mentioned that lenders and Guaranty Agencies do not consistently get student status changes directly from schools .	Mercedes Zajilek	Change to Deliverable Text	Text revised to reflect this comment.
41	2.10 Direct Loan and Federal Family Education Loan Consolidaiton	83	Reword the following sentence: "There is only one type of Federal Consolidaiton Loan, but a portion of it may be subsidized." to "There are Subsidized and Unsubsidized Federal Consolidation Loans (FFEL PLUS Consolidaitons are included in the Unsubsidized category).	Heather Burrs	Change to Deliverable Text	Text revised to reflect this comment.
42	2.11 Federal Family Education Loan Collections	96	Change "Collection Retention Fee" to "guaranty agency retention allowance".	Susan Ferraiole	Change to Deliverable Text	Text revised to reflect this comment.
43	2.9 Federal Family Education Loan Transfers	82	Add that FFELs are transferred "either through loan sales or for administrative reasons" and that guarantee transfers occur "in a few cases."	Susan Ferraiole	Change to Deliverable Text	Text revised to reflect this comment.