No.	Comment ID #	Comment	FSA Response	Revision to Guidance Required?
1	ED-2019-ICCD-0132-0004	The DCIA Aging and Data Requirements for Guaranty Agencies document appears to use the term 'debt' and 'loan' interchangeably and provides no context for these terms. Recognizing that borrowers in the FFEL program may have multiple loans, each with unique default claim paid dates, could you please provide an answer to the following questions to clarify the requirements. 1. Does FSA prefer having one delinquency date per debtor reported, which would be consistent with TOP reporting requirements? 2. Or, does FSA want to have multiple delinquencies per debtor reported and placed in different aging categories depending on default claim paid date? 3. If the preference is for one reported delinquency date, should the oldest default claim paid date be used, or the most recent default claim paid date (consistent with TOP)?	Yes; the terms "loan" and "debt" are used interchangeably. However, Footnote 1 on page 5 of the guidance states the following: "The aging methodology to follow and consequently how to age GA-held debt is independently determined for *each individual debt* [emphasis added]." Therefore, the DCIA reporting requirement is that if a borrower has multiple loans (debt) with varying delinquency dates, then the GA would age each loan (debt) based on its respective default claim date.	No.

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2	ED-2019-ICCD-0132-0005	Please provide guidance for determining the age category for loans reported on MR-32 where reinsurance has been REQUESTED but NOT YET REIMBURSED by FSA. Per the GAFR instruction guide MR-32 should include FFEL program loans on which claims have been paid to lenders and reinsurance has been requested by or paid to the GA (September 2019 GAFR page 67). The DCIA Aging and Data Requirements for Guaranty Agencies document instructs GA's to start aging when FSA reimburses the GA for a paid claim (DCIA document page 8). This difference in reporting instructions will result in the sum of lines 2-13 not equaling the sum reported on MR-32 of the GAFR. A population of loans reported on MR-32 where reinsurance was requested but not yet reimbursed will be excluded on the MR-32 Loan Ending Balance Aging Data Set.	To resolve this issue, FSA has updated the DCIA Aging and Compliance Data Requirements document to state that the claim date (rather than the reinsurance date) should be used with the Date Acquired Aging Methodology. Additionally, this revision supersedes the response previously given to Question 24 of the "FSA Responses to GA Questions" document distributed after the meeting held on September 18, 2019.	Yes; Table 2.3.1 on page 8 has been updated to reflect that the lender claim date (not the reinsurance date) should be used when determining age under the Date Acquired Aging Methodology. Additional minor revisions were made to the document's planned implementation date, *Title IV* claim types table, and glossary.

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3	Question Received Via an Alternate Channel	In the Aging Data set (MR32 ending balance), we need to apply one of two methodologies for aging each loan based on whether collection efforts have been suspended or not on the loan. We believe we can accomplish this with our status codes on our system but we have over 40 status codes that we will need to categorize as collection efforts suspended or not. In order to do that, we need to be clear on how FSA is defining "suspended collection efforts". The only thing I can find is in the Q&A document where it says "collections on a default claim debt are suspended as required by law regulation and/or policy". Is there a definition of suspended collection efforts in the new GAFR requirements beyond what is written in the Q&A document that will help us categorize our status codes?	There are many reasons why a GA would "suspend collection activity" on a borrower's account. We have listed several example events in Footnote 7 (page 9 of the Data Requirements guidance) that would trigger the Frozen Aging Methodology. However, it is not a comprehensive list of all possible events. GAs should refer to the Federal Register and any other Department-provided guidance they are required to follow to ensure compliance with this methodology. GAs can also contact FSA's Program Operations Division for assistance. Pursuant to 1.1.1 Limited Purpose of this Document, we are unable to provide operational guidance beyond the scope of the preparation of the DCIA Compliance Data Set.	No.