

U.S. Department of Education / Federal Student Aid
Docket: ED-2019-ICCD-0132 - DCIA Aging and Compliance Data Requirements for Guaranty Agencies
Comment Response
March 18, 2020

No.	Comment ID #	Comment	FSA Response	Revision to Guidance Required?
1	ED-2019-ICCD-0132-0009	<p>The following question pertains to the MR-32 and MR-41 Loan Ending Balance Disposition Data Set.</p> <p>How do GAs account for changes that occur in the disposition of debts between the date the most recent weekly TOP referral process is executed to the date the Monthly Form 2000 is processed?</p>	<p>Debts in scope as of month-end are reported in the MR-32 and MR-41 Loan Ending Balance Disposition Data Set (Disposition Data) based on the actual month-end balance but applying the TOP Referral disposition “rules/criteria” identified in the most recent weekly TOP Referral process prior to month-end.</p> <p>To account for this timing difference, additional lines are provided to report debts not in scope at the time of the last TOP referral (lines 119-121) or for which no disposition could be identified (lines 122-124).</p> <p>Changes that occur in the disposition of debts between the date the most recent weekly TOP referral process is executed prior to the month-end reporting date, and current month-end reporting date, are ignored. The impact of this should be minimal since the number of intervening days would not be expected to exceed seven days.</p>	No

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2	ED-2019-ICCD-0132-0010	<p>Part 1:</p> <p>When a debt transitions from the Date Acquired methodology to the Frozen methodology how is age determined? Is it calculated as date GA paid lender to the date the GA suspends collection efforts?</p>	<p>Under "Frozen Aging" the age of the debt (i.e., number of days delinquent) is equal to its age per Date Acquired Aging on the date that the GA suspends collection efforts.</p> <ol style="list-style-type: none"> 1) If this is the first suspension of collection efforts, then days delinquent is equal to: <ol style="list-style-type: none"> a) Date GA suspends Collection efforts; MINUS b) Claim Date 2) If this is not the first time that collection efforts have been suspended, then the number of days that collections were previously suspended AND Frozen Aging was applicable, must be subtracted from the result noted in Calculation 1 above. 	<p>Yes.</p> <p>Tables 2.3.1. and 2.3.2 (Date Acquired Aging Methodology and Frozen Aging Methodology respectively) have been revised to improve clarity in response to this question. An aging scenario has also been included as Appendix B.</p>
2	ED-2019-ICCD-0132-0010	<p>Part 2</p> <p>When a debt transitions from Frozen back to Date Acquired how is the age determined? Is if calculated as current date less date GA paid the lender as though the frozen period never occurred?</p>	<p>No; if, after a period of Frozen Aging, a GA later resumes its collection efforts for the default claim debt (i.e. the debt transitions from Frozen Aging back to Date Acquired Aging) then Number of Days Delinquent (i.e. the age of the debt) for DCIA purposes will be calculated as:</p> <ul style="list-style-type: none"> • Current Date <p>MINUS</p> <ul style="list-style-type: none"> • Claim Date <p>MINUS</p> <ul style="list-style-type: none"> • Days in Frozen Aging 	<p>Yes.</p> <p>Table 2.3.1 Date Acquired Aging Methodology has been revised to improve clarity in response to this question.</p>

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2	ED-2019-ICCD-0132-0010	<p>Part 3:</p> <p>Is the definition of "Suspended" under the Determining Age section of the Date Acquired Methodology on page 8 equivalent to the definition of "Frozen" on page 9? In both situations is accrual of interest and fees frozen?</p> <p>When we "suspend" collections interest continues to accrue but payments are not required. Please confirm if this debt scenario would require the Frozen Aging Methodology.</p>	<p>The term "suspended" refers only to whether or not the GA has suspended its collection efforts and not to whether or not interest is accrued.</p> <p>The term "Frozen" is used to define the applicable DCIA Aging methodology after collection efforts have been suspended by the GA.</p> <p>Dollar Value of Delinquency is the accelerated balance due as of the reporting date.</p> <p>Business rules as they relate to the accrual of interest after collection efforts have been suspended are the responsibility of Program Operations. Questions on this topic are, therefore, outside the scope of the DCIA Aging and Compliance Data Requirements document and should be addressed to Program Operations.</p>	<p>Yes.</p> <p>Table 2.3.2 Frozen Aging Methodology has been revised to improve clarity in response to this question, including the detail of how the dollar value of delinquency is determined when Frozen Aging is applicable.</p>

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3	ED-2019-ICCD-0132-0012	Will Revenue Procedure 2020-11 have any impact on the necessity of the MR-24 Collection Termination Write-Off Data Set requirement?	<p>No; it does not have any impact on the MR-24 Collection Terminations Write-Off Data Set (Write-Off Data) requirement.</p> <p>Note, however, that Revenue Procedure 2020-11 may impact the disposition of a given debt with respect to the Write-Off Data. For example, if the discharged debt exceeds \$600 and meets the criteria presented in the Revenue Procedure, the discharged debt will be exempt from 1099-C reporting in the following calendar year. It would, therefore, be reported on the following Data Set lines:</p> <ul style="list-style-type: none"> • Line 2-Collection Terminations Reported During the Previous Calendar Year; and • Line 5-Not Reported to IRS Form 1099-C (Must Footnote). 	No.