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Litigations approved by Region 9 will be counted as an administrative resolution in CPCS and PCAs will be paid the appropriate administrative fee per the SOW.

**Please Note:** San Francisco litigation staff will reject all packages with errors and if packages have the same error more than twice, the entire batch will be returned to the PCA for further quality control. It is very important that PCAs do thorough quality control of ALL cases prior to submission in order not to delay the approval of their cases.

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## CHAPTER 14: PAYMENT PROCESSING

Processing borrower payments is one of the most crucial functions within debt collection. The main goal with any debt collection is to hopefully negotiate a successful account resolution and obtain payments from the borrower.

Borrowers are able to make payments in a variety of ways (sometimes with restrictions) in an effort to satisfy debts quickly, timely and efficiently. Borrowers may pay by personal check, cashier's check, credit card, Western Union, or through ED's direct debit program (DDP).

**Please note:** *Foreign borrowers can send in personal checks from foreign banks* (b)(7)(E)

(b)(7)(E) The checks do NOT have to be in US funds. Though paying in US funds will make the posting process simpler and quicker.

### 1. NATIONAL PAYMENT CENTER (NPC)

The National Payment Center processes all borrower payments (except Credit Cards) and creates files to post all payments into the DMCS. In most cases all payments received at NPC prior to 10:30am Central Time will be posted the same day. Payment processing is handled by the Treasury Department's contractor, Bank of America.

To aid payment processing efficiency, whenever possible borrowers should include payment coupons with their payments.

#### A. Payment Address

Borrowers should be directed to make their payment payable to the U.S. Department of Education, note their Social Security number on the face of the instrument, and mail it to:

**U.S. Department of Education  
National Payment Center  
P.O. Box 105028  
Atlanta, GA 30348-5028**

Because payments received at the contractor's street address are processed as exceptions, they strongly discourage the use of overnight mail services.

### 2. SPECIFIC PAYMENT TYPES

**A. Americorp and Department of Defense Loan Reimbursement Loan Program**

Upon receipt of an Americorp payment application form, the PCA will forward the document to Vangent for completion. *The agency will not receive commission for these payments.*

**B. PCA generated checks and Speedpay**

PCAs have the ability to generate checks for the borrower or use Speedpay processes to assist borrowers with making consistent, timely payments.

With the PCA generated checks, the PCA is able to print checks on-site from the borrower checking accounts, bundle groups of checks and mail to NPC for posting. All such checks shall be kept in a locked and secure area with limited access to the staff.

With Speedpay, PCAs are able to transmit borrower checking information through Speedpay. Speedpay is in the process of establishing an ACH process through Pay.gov to process their payments.

The borrower's banking information, whether on paper or electronic format should only be accessible to authorized personal. This information should not be stored in common areas (i.e., on the collector notepad or in an open, unlocked area) The PCA is responsible for all penalties incurred by the borrower due to any errors made by the PCA staff in processing of these payments i.e. duplicate posting of payments, early processing of payments, etc.

With regards to these payments, the following issues should be noted:

➤ The costs of these services may NOT be passed on to the borrower.

➤ These payments are personal checks and (b)(7)(E)

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**C. Western Union**

The purpose of Western Union is to allow borrowers the ability to make payments via Western Union Quick Collect.

To participate in the program, the PCA should:

- Call Client Services @ 1/800/238-5772 to establish their code city identification.
- When the code city identification is established, the PCA should notify the Assistant COR and provide the ID.

When assisting borrowers, the PCA may indicate the following:

- If the borrower wishes to make a payment via Western Union Quick Collect, the PCA can direct the borrower to 1/800/525-6313 or to Western Union’s website [www.westernunion.com](http://www.westernunion.com) to obtain the most conveniently located Western Union office.
- The PCA should also provide the borrower with their code city ID for payment transmittal.
- PCA should explain that Western Union assesses a fee and the fee cannot be deducted from the borrower’s payments.
- It is the borrower’s responsibility to research any missing Western Union payment.

Western Union Quick Collect payments post on ED’s Payment History Screen, R103, as a PY.

**D. Conditionally Endorsed Payments**

PCAs should remind borrowers not to write conditional statements on their payment instruments (i.e. account paid in full) because it may cause the payment to be rejected by NPC.

**E. Debt Specific Payments**

Directed payments are payments received with specific instructions on how to apply the payment.

There may be situations where a borrower wants to pay off a specific debt first. For example, Pell Grant Overpayments cannot be included in Loan Rehabilitations and no debt can be consolidated with a judgment. For these reasons, a borrower may want to pay off a specific debt in order to gain access to other programs.

If a borrower wants to direct a payment, they should indicate this by writing the debt ID number directly on the payment instrument.

Borrowers will occasionally request that their payments be applied in a specific manner, such as “apply only to principal” or “not to be applied to fees or charges.” These instructions will be ignored and the payment will be processed as a regular payment as if no special instruction was indicated.

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### 3. CREDIT CARD PROCESSING

#### A. Pay.gov Website

PCAs may process credit card payments for ED borrowers through the Pay.gov government wide payment services program. Contractors may not process credit or debit card payments through any other means. Basic requirements include:

- The Pay.gov site accepts Visa, MasterCard, Discover and American Express credit cards, and debit cards displaying the Visa or MasterCard logos.
- Any contractor that processes credit cards/debit cards for accounts shall abide by all credit card securities and requirements as outlined by ED and contained in the Payment Card Industry Data Security Standard (PCI DSS).
  - The Contractor is responsible for the security of any cardholder data it maintains or possesses.
- PCA must process any payments a borrower wishes to make by credit/debit card.
  - At this time, ED does not allow borrowers to enter payments directly to Pay.gov.
  - If the contractor allows borrowers to enter credit/debit card information for *payments to the Contractor's own website*, the Contractor must submit their *procedures to ED's Atlanta Regional Office* for review prior to use.
- Payments may be entered individually, or the Contractor may participate in the Open Collections Interface (OCI), which allows the contractor to submit requests to receive and process collections electronically "on-line".
  - OCI information is basically transmitted to the PCAs upon request due to the fact that each PCA that wishes to obtain the OCI authority has to be processed via Pay.gov and the processing is performed via scheduled appointments.

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- Reference:
- SOW, Section 2.7.1 Credit Cards
  - Payment Card Industry (PCI) Data Security Standards  
<https://www.pcisecuritystandards.org/>
  - Pay.gov site  
<https://www.pay.gov/paygov/>

**B. Credit Card Processing Team**

ED currently has three staff working on Credit card processes.

Thomas Crowley, 404-562-6054 or email [Thomas.Crowley@ed.gov](mailto:Thomas.Crowley@ed.gov);  
 Phyllis Marks, 404-562-6096 or email [Phyllis.Marks@ed.gov](mailto:Phyllis.Marks@ed.gov);  
 Ezora Sweet-Grundy, 404-562-6080 or email [Ezora.Sweet-Grundy@ed.gov](mailto:Ezora.Sweet-Grundy@ed.gov).

**C. Registering New Users to Pay.gov**

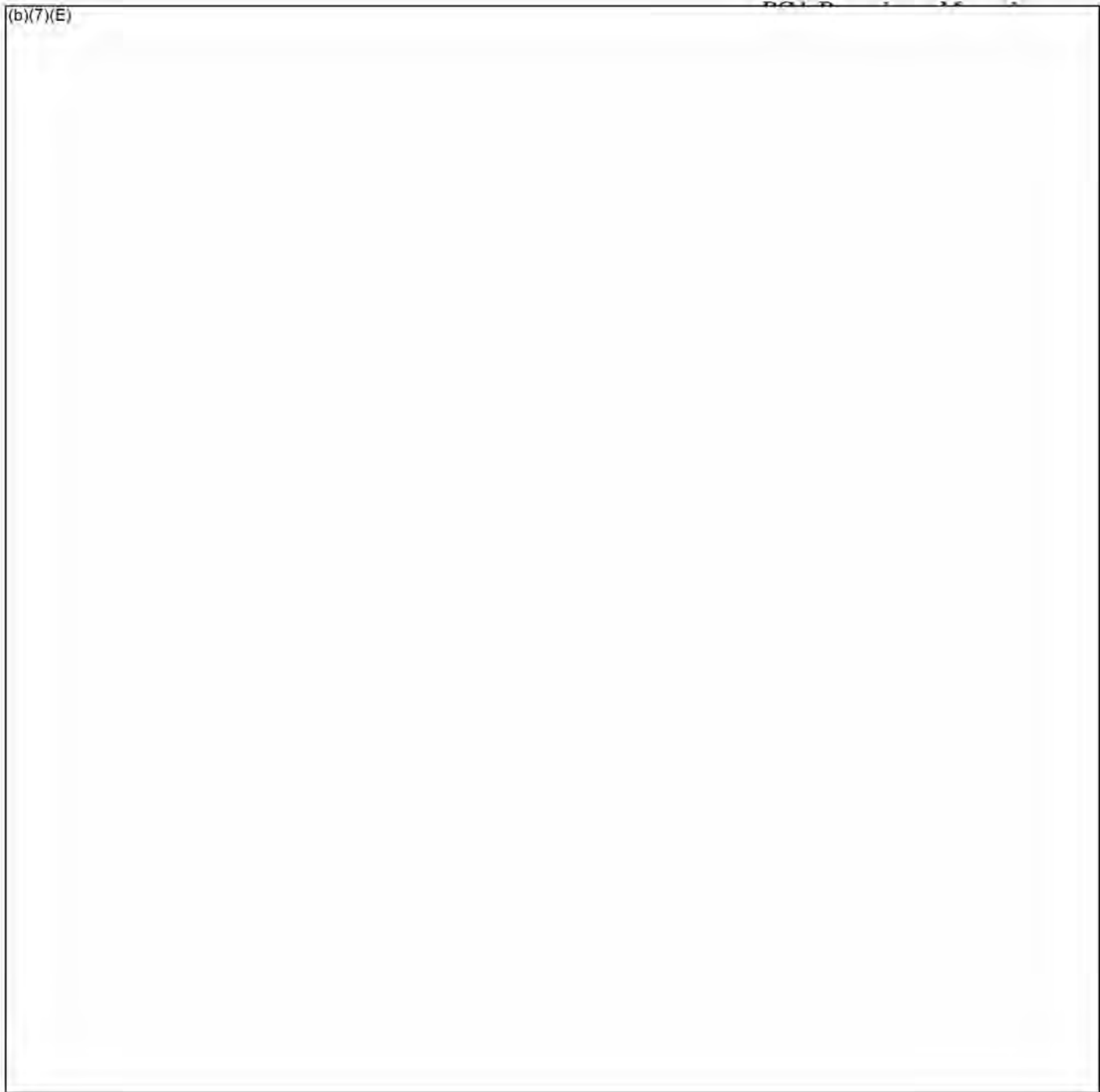
In order to use this system all 'End Users' must be registered via the Pay.gov Information System Security Officer. In accordance with the requirement of registration, the PCA must:

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**D. Password Change or Forgotten Password**

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**E. Credit Card Payment Processing Instructions**

Inputting Credit Card Transaction - This function is performed by persons registered via Pay.gov Information Security only.

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**F. Recurring Credit Card Payments**

The borrower and PCA may agree that recurring payments via credit or debit card are advantageous. ED has identified three accepted options for such recurring payments.

The three accepted options are as follows, and may be used singularly or in combination:



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Under all options, agencies must use extreme caution when obtaining and securing borrower credit/debit card information. Agencies must ensure they are in compliance with the PCI Data Security Standards.

#### **G. Chargebacks (Refunds of credit card payments)**

Chargebacks are refunds of part or all of a credit card payment. Chargebacks may be initiated by:

- The Contractor (such as when an error has been made),
- By the cardholder through his card issuer, or
- By ED if an account is overpaid.

Chargebacks initiated by the borrower:

- Come through their credit card issuer and are sent directly from Cash Link/Fifth Third Bank to ED,
- Generally processed within three days of posting on the Cash Link Voucher Summary Report.
- These refunds are usually generated as a result of borrower dispute of payment with their respective card issuer (bank to bank disputes).

If the Contractor requests the chargeback:

- The Contractor is responsible for providing the information necessary to process the chargeback
- The chargeback request should be directed to the ED credit card processing team.
  - Chargebacks (refunds) must be in writing on a "Credit Card Charge Back Information Request Form" with a copy of the original processing form and any other Pay.gov generated support documentation available

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**H. Voiding Credit Card Transactions**

If the Contractor recognizes that they have made an input error, they can request that the transaction be cancelled, or voided.

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**I. Contractor Responsibilities**

The Contractor must:

- Ensure all information input on credit card system is correct

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- Inform ED the day of input when borrower is requesting debt level posting of payments.
  - Debt level posting requests must be clearly identified to the National Payment Center (NPC) and certain system requirements have to be in place before the payment can be properly posted at the debt level.
- Record contact information such as the payer's mailing address on the Credit Card Processing Form and the Pay.gov system for all transactions.
  - A telephone number should also be provided on the credit card processing forms for all third party payments.
- Abide by all credit card securities and requirements as outlined by ED and contained in the Payment Card Industry Data Security Standard (PCI DSS)

**4. UNIDENTIFIED PAYMENTS**

Payments that are unidentified or that cannot be posted to an account will go into suspense and will be listed on the Unidentified Payments Report (Suspense Report).

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The Suspense Report will be posted monthly

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monthly suspense file is available for download on the first or second Monday of the month. For agencies that have multiple contracts there is only a file for the last contract.

When the PCA is notified by a borrower that a payment has not been posted, the PCA should:

- Direct the borrower to send in a copy of the front and back of the payment instrument.
  - If the missing payment is a money order, advise the borrower to have it traced.
- If the canceled check is unavailable, information such as the check number, date, amount, etc. is required.

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If the PCA notes fees that should be removed from the account, the Contractor should submit an IMF.

**C. Administrative Fees Added By ED**

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**D. Requesting Removal of Fees**

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Reference:

SOW, Section 2.7 Repayments

ED staff (table of ED staff members responsible for reports)

## **CHAPTER 15: INVOICE PROCESSING**

This section will describe how the PCAs will bill ED for services rendered.

### **1. OVERVIEW**

Each month, ED DMCS will produce reports reflecting each PCA's collections by type (consolidation, rehabilitation, and regular) as well as the administrative resolutions and litigations.

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These reports will be delivered to the Atlanta Regional Office for review, and be made available for download by the PCAs..

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- If the voucher is acceptable, the PCA will sign and submit the voucher electronically to ED's Chief Financial Office – Budget Division.
  - Any discrepancies will be reported to Atlanta and Atlanta will prepare a new voucher as appropriate.

### **Downloading Reports**

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2. On the file of detail data, payments are grouped by type (as on the hard copy reports) and each section begins with a single-line header record (e.g., "regular," "rehabilitation," and "consolidation"). Similarly, the admin and lit sections begin with a single-line header record.
3. Agencies with more than one contract will find all of their reports under their most recent contract file name. Section header records within the file will identify the "AG" number associated with the following records.
4. Any month's data will only be available for about a month. At the beginning of each month, we will overwrite the files with a new month's data.

## 2. VOUCHER

The invoice voucher (OMB Form # 1034) is the PCA's signed statement billing ED for services rendered. By signing this document, the signer avers that the services for which ED is being billed have been performed in compliance with the contract and with all applicable laws and regulations.

What follows is a facsimile of a voucher, with key items numbered. These items are described in detail below.

PUBLIC VOUCHER FOR PURCHASES AND SERVICES OTHER THAN PERSONNEL		VOUCHER NO.
U.S. DEPARTMENT, BUREAU, OR ESTABLISHMENT AND LOCATION		Nonresponsive
DATE VOUCHER PREPARED 07/03/97		GOVERNMENT B/L NUMBER 941 09 0027
CONTRACT NUMBER AND DATE PC97123456		
REQUISITION NUMBER AND DATE		
PAYEE'S NAME AND ADDRESS Friendly Collectors 123 Good Customer Service Lane Washington, DC 20202		
Contact: John Doe Phone: 202-260-1750		
SHIPPED FROM TO WEIGHT		
UNITS PRICE AMOUNT		
AND DATE OF ORDER March, 19 5	DELIVERY OR SERVICE Regular Collections Adjustment Cons/Rehab Collections Incentive Bonus Adjustment Adjustment Unapproved Compromises Administrative Resolutions Adjustment Litigation Preparations Adjustment	QUANTITY 25.0% 12.0% 1/5.0% \$4.00 \$40.00 1
	AMOUNTS RECEIVED \$10,000,000.00 (\$10,000.00) \$1,000,000.00 \$995,000.00 \$11,000,000.00 10.01 10	AMOUNT \$2,500,000.00 (\$2,500.00) \$120,000.00 \$119,400.00 (\$1,000.00) \$4,000.00 (\$40.00) \$40.00 \$400.00
PAYMENT AUTHORITY APPROVED FOR (Payee must NOT use) the space below		TOTAL \$3,280,300.00
CHECK NUMBER		
ACCOUNTING CLERK ON		
ON ACCOUNT OF U.S. GOVERNMENT PRECISE NUMBER 1994		
1 ASST	2 DATE	3 PAYEE

Distribution authorized to the Department of Education and its Private Collection Agency contractors only. Other requests shall be referred to the Federal Student Aid Acquisitions Group.

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**3. DMCS REPORTS**

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**A. Collections Detail Report**

This report itemizes every payment posted during the month. Individual detail reports will be generated based on the various commission rates in effect, i.e. separate detail reports will be generated for regular payments and for consolidation and rehabilitation payments.

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- **Posting Date:** The date the payment is actually posted to the system.
- **Payment Date of Receipt:** In general, this date correlates to the “Effective Date” associated with the transaction on the system R103 screen. Note that E-Systems has three days from payment receipt in which to post the payment.
- **Commission Month:** The month in which the collections posted. This correlates to the “Date of Delivery of Service” on the voucher.
- **Collection Type:** This correlates to the transaction type (b)(7)(E)  
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- **Check Number:** The payment instrument’s serial number.

**B. Collections Summary Report**

This report gives the aggregate amounts from the various detail commission reports.

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**C. Administrative Resolution Detail Report**

This report itemizes every account returned as an administrative resolution, and lists the resolution type: disability (DIS), death (DEA), bankruptcy (BAN), incarceration (INC/INW) or ~~U.S. (CAN)~~

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**D. Administrative Resolution Summary Report**

This report summarizes the resolutions, by day and by type, and provides totals for the day and

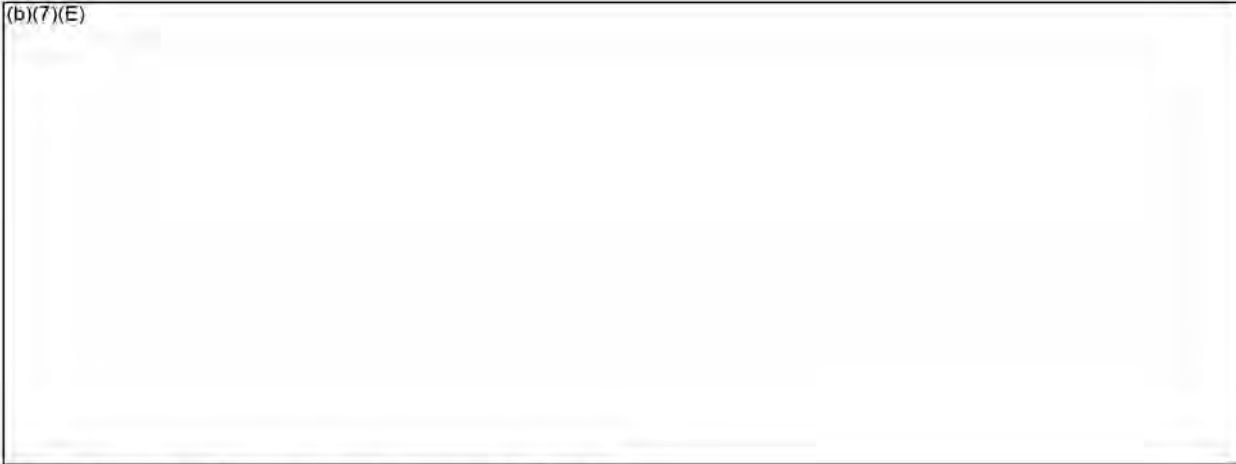
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- **Day:** The day of the month identified in the report header on which the resolved accounts were returned.
- **Number of Accounts:** The number of accounts returned on that day for that type of resolution.
- **Current Balance:** The total account balance, for the accounts returned on that day for that type of resolution.
- **Fees:** The total fees due, for the accounts returned on that day for that type of resolution.
- **Totals by Resolution Type:** The total number of accounts, total account balances, and total fees for the month for that type of resolution.
- **Grand Totals:** Totals all activity for that day. The column totals in the report footer represent the gross activity for the month.

**E. Litigation Preparation Detail Report**

This report itemizes each account for which a litigation preparation package has been submitted.

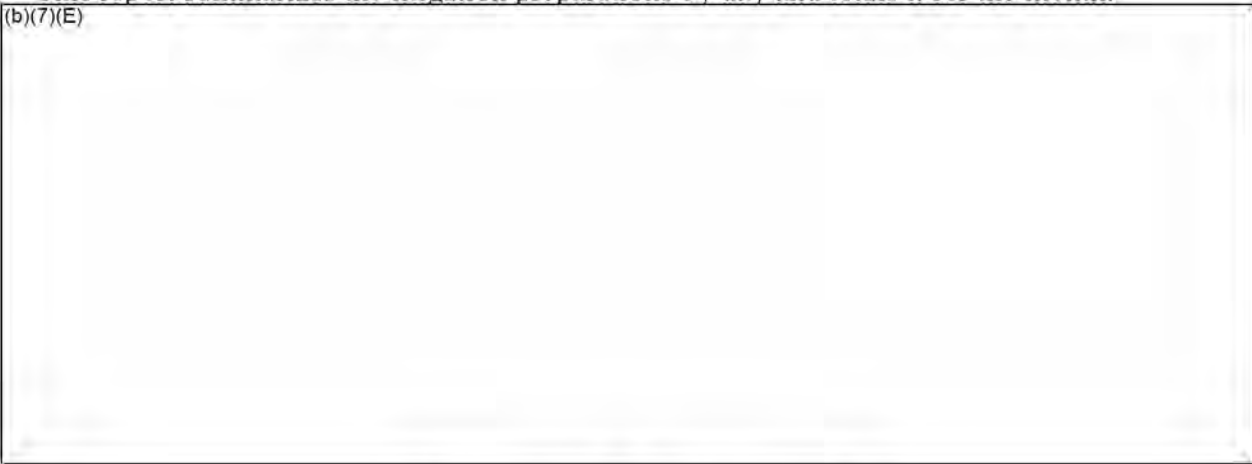
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**F. Litigation Preparation Summary Report**

This report summarizes the litigation preparations by day and totals it for the month.

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**4. VOUCHER PROCESSING**

**A. When the Voucher is Received**

The voucher will be submitted electronically to the PCA for review after the end of the month, and will be accompanied by an Excel workbook containing any Adjustments Memorandum (if necessary). The ED DMCS commission reports will be available for the PCA to download. Upon receipt, the PCA should:



- Carefully review the voucher and accompanying documentation to ensure that all values are correct, and that any adjustments the PCA requested and ED approved have been reflected.
  - Report any discrepancies to Region 4 (b)(7)(E)
- Sign and date the voucher
- Submit the voucher electronically to ED's Chief Financial Office – Budget Division at (b)(7)(E)

The Prompt Payment Act requires that the Government reimburse its vendors within 30 days of the receipt of a valid voucher.

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2. **Collection Type:** Commission adjustments are also identified by collection type that identifies which contract and what rate to associate with the transaction. Current collection types are as follows:

Collection Type	Meaning
CN1	1997 Contract Rate Consolidation
CN2	2004 Contract Rate Consolidation
CND	2000 Contract Rate Direct Consolidation
CNF	2000 Contract Rate FFEL Consolidation
FO1	2004 Contract Rate TOP Alias Pilot
RG1	1997 Contract Rate Regular Collections
RG2	2000 Contract Rate Regular Collections
RG3	2004 Contract Rate Regular Collections
RH1	1997 Contract Rate Rehab
RH2	2000 Contract Rate Rehab
RHD	2004 Contract Rate Direct Rehab
RHF	2004 Contract Rate FFEL Rehab

**5. INVOICE SUBMISSION**

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ED will also send detailed

documentation supporting the amounts on the invoice.

**A. Sending Invoices**

The PCA shall review the invoice and supporting documents and return the invoice via e-mail in order to be paid for products and/or services rendered under this Task Order. (The PCA should only e-mail the primary invoice, NOT the supporting detail, which is already collected and maintained by the COR.)

The parties agree that the e-mail message returning the invoice to ED will constitute as an electronic signature indicating the Contractor’s approval of the invoice.

If the Contractor does not agree with any part of the invoice, the Contractor shall immediately notify the Atlanta Regional Office, (b)(7)(E)

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Federal Student Aid's “designated billing office” is:

US Department of Education  
 Union Center Plaza  
 Federal Student Aid Administration  
 830 First Street, N.E. Suite 54B1  
 Washington, D.C. 20202-0001  
 E-mail: [InvoiceAdmin@ed.gov](mailto:InvoiceAdmin@ed.gov)

The PCA shall e-mail the invoice to [InvoiceAdmin@ed.gov](mailto:InvoiceAdmin@ed.gov), with “cc” copies to the Contract Specialist, the COR, and Assistant COR.

**B. Proper Invoices**

The PCA is responsible for ensuring that the invoice meets the requirements for a “proper” invoice.” (b)(7)(E)

(b)(7)(E) The PCA is responsible for ensuring the accuracy and completeness of the information.

At a minimum the following items must be addressed in order for the invoice to be considered “proper” for payment:

- (1) Name and address of the Contractor.
- (2) Invoice or voucher number. The Invoice or voucher number must be in the format AG###-YEAR-MO, where:
  - i. “AG###” is the agency number (e.g., AG555) that FSA has assigned to the Contractor for this Task Order.
  - ii. “YEAR” is the four-digit year (e.g., “2010” for the invoice covering services provided in September 2010)
  - iii. “MO” is the one or two-digit code for the month covered by the invoice (e.g., “9” for the invoice covering services provided in September).
- (3) Invoice Date.
- (4) The Task Order number must be included on the invoice and be correct.
- (5) Description, quantity, unit of measure, unit price, and extended price of the item delivered must agree with the contract or order.
- (6) Terms of any prompt payment discount offered.
- (7) Name, title, and phone number of persons to be notified in event of defective invoice.
- (8) The period of time covered by the invoice.

Reference: RFQ, Section B.7

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**8. REQUESTING ADJUSTMENTS**

Attentive PCAs will occasionally detect posting problems or other instances in which they feel entitled to a commission that was not paid. Such situations should be promptly reported to the Atlanta Regional Office.

The PCA must submit an IMF to Atlanta requesting commission for any payment or administrative resolution or litigation fees not listed on the monthly commission report.

For adjustments involving payments, the IMF must include:

- The borrower's name
- Account number
- Payment effective date
- Payment amount
- Reason the PCA believes they are owed commission for the payment in question

For adjustments involving administrative or litigation fees, the IMF must include:

- The borrower's name
- Account number
- Reason PCA believes they are owed an administrative resolution or litigation fee

The PCA must attach any supporting documentation.

No manual adjustments will be made for items that will appear on next month's reports. The monitor will respond to the IMF informing the PCA of the decision and the status of the commission adjustment requests.

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**A. Current Contract**

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## CHAPTER 16: TRAINING

Training is a crucial part of any business process, especially debt collection. Aside from specific company training endeavors to improve workforce outcomes and retain highly productive staff, the Education Collections Contract has specific requirements and guidance around PCA training.

Reference: SOW 2.2; 5.1; 5.2; 6.2.6

### 1. MANUALS

The PCA is required to develop a comprehensive Collection Training Manual. The manual should outline such items as:

- Training procedures
  - Main office, satellite offices, subcontractors
- Any specific time frames
- Training approaches
- Targeted staff
- Training topics
  - Both ED and PCA
- Record maintenance
- Any special processes related to specific training

Though the above list is not all inclusive, the PCA Manual should provide enough information and detail so that an outside party will have a clear understanding of the PCA's training protocol.

In addition to a Training Manual, PCAs are also required to develop a Standard Operating Procedures Manual and a Quality Control Plan that should support and compliment training initiatives.

All DRAFT training manuals are due within 90 days of contract award and final versions completed within 30 days of ED approval of draft versions. Manuals will be reviewed by the Atlanta Regional Office and the Contracting Officer's Representative (COR) and Assistant Contracting Officer's Representative.

### 2. ED TRAINING

ED will provide training on appropriate ED Procedures to the Contractor's Training Staff. Specific training will be provided at contract start-up to assist PCAs and their staff in gaining a

clear understanding of specific ED requirements, guidelines and regulations surrounding the Education Collections Contract. Training will focus on key elements such as security, DMCS access, payment programs, complaints, AWG, administrative resolutions, etc.

Though initial training will be comprehensive and encompass all key areas of the contract, ED will continue to provide training opportunities throughout the entire contract period. ED often hosts PCA meetings several times a year during which ED staff often provide update, refresher or new topical training.

All training materials (presentations, handouts, etc.) will be available on the PCA collections website for downloading and dissemination.

### 3. **PCA TRAINING**

#### **A. ED Information**

The PCA is required to train all ED contractor employees and conduct regular training sessions for its employees and any subcontractor employees to ensure adherence to applicable laws, regulations and ED policies. Any ED training or key information shared during meetings, conferences, etc. must be shared with all appropriate PCA staff. The PCA shall conduct additional training to inform its employees and any subcontractor employees of all changes in operational procedures, laws or regulations as they are modified or updated. Often the individuals who hear the information are not the ones actually doing the work.

#### **B. Industry Training**

The PCA must also provide State and locality debt collection-related training to the employees, including the successful completion by Contractor and subcontractor employees of any State-mandated exams.

#### **C. Privacy Act Training**

Each employee and subcontractor employee assigned to THIS 2009 Task Order must receive training relevant to the Privacy Act of 1974, and shall certify, in writing, that they have received this training before they begin any collection activity on ED accounts. Please note: ALL employees must receive training and provide signed certifications regardless of whether or not they have provided certifications on past Education contracts. A sample certification form can be found in Section 6 of this Chapter.

Signed certifications must be forwarded to the Atlanta Regional Office within five (5) calendar days after completion of training.

Attention: Privacy Act Certification Team  
61 Forsyth Street, SW

Room 19T89  
Atlanta, GA 30303

Each employee must re-take the Privacy Act Training on an **annual basis to be completed each year by July 15**. All Privacy Act training must be documented and recorded in the Security Awareness and Privacy Act Training Report (Chapter 17).

#### **D. Security Awareness Training**

Each employee and subcontractor employee assigned to **THIS 2009** Task Order must receive training relevant to Security Awareness, and shall certify, in writing, that they have received this training before they begin any collection activity on ED accounts. Please note: ALL employees must receive training and provide signed certifications regardless of whether or not they have provided certifications on past Education contracts. A sample certification form can be found in Section 6 of this Chapter.

Signed certifications must be forwarded to the Atlanta Regional Office within five (5) calendar days after completion of training.

Security training shall incorporate physical, data, personnel, document and equipment security, along with specific information regarding proper incident response and handling procedures. PCAs shall follow the Department's training policy, IT Security Awareness and Training Guide, and modify training in accordance with any updates, policies, or initiatives as directed by ED. Security Awareness training must also **provide and document incident response and handling procedures**.

All new hires will complete security training within **10 business days** of ED contract employment. All employees must receive annual refresher security training by July 15 of the following year (or any other date as specified by ED) for as long as the employees are on the ED contract. All security awareness training must be documented and recorded in the Security Awareness and Privacy Act Training Report (Chapter 17).

## **4. TRAINING DOCUMENTATION**

The PCA shall measure the effectiveness of the training by administering post-training tests. The COR/Assistant COR may review the results to ascertain the need for additional training/testing.

A certification form for ALL training provided in support of this task order must be signed by each PCA and subcontractor employee and maintained on file by the PCA.

Along with certifications, the PCA must record (electronic spreadsheets, tracking forms, etc.) all training provided to PCA employees or subcontractors by individual names, training topics, and dates of training. The PCA shall make certifications and all training records available for ED review at the request of the CO, COR, assistant COR or ED Monitors.

Specific training information (updates, dates of training, training topics) is mandated within certain monthly PCA reports, including the PCAs' Management and Fiscal Report and the Security Awareness Training Report. (See Chapter 17 for more information)

## 5. **TECHNICAL ASSISTANCE/TRAINING VISITS**

The PCA may request site visits for technical assistance and/or training. The PCA will be responsible for travel costs incurred for requested technical assistance and/or training site visits. Proposed costs must be consistent with the most current Government per diem rates for lodging and meals.

On-site technical assistance visits are very rare due to workload and time constraints. One-on-one technical assistance/training usually takes place during scheduled on-site compliance reviews. In addition, PCA staff may travel to ED Office locations for one-on-one or small group training initiated by the PCA or ED.

**6. TRAINING CERTIFICATION FORMS**

**A. Privacy Act**



**Certification of Privacy Act Training  
U.S. Department of Education – 2009 Collections Contract**

I **certify** that I have completed training relevant to the Privacy Act of 1974 (5 U.S.C. 522a) and its application to collection activity.

I **understand** the conditions of authorized disclosure as described in subsection 3(b)3 of the Privacy Act and have **read and understand** the pertinent parts of the Act and the OMB Privacy Act Guidelines, including subsection 3(a), Definitions; 3(b), Conditions of Disclosure; and 3(i), Criminal penalties.

I have also **read and understand** the pertinent parts of ED’s Privacy Act Regulation, including Section 5b.1, Definitions; 5b.9, Disclosure of Records; and Appendix A, Employee Standards of Conduct.

I **understand** that I cannot begin any collection activity on ED accounts until I have completed the training and must complete annual Security Awareness training by July 15 of each subsequent year.

I **will consult** with a supervisor or, when appropriate, an ED Monitor, if in doubt on a specific disclosure question. If others ask me to make an unauthorized disclosure, I **will decline** and report the incident to my Supervisor or Project Manager immediately.

\_\_\_\_\_  
**Employee (TYPE name)**

\_\_\_\_\_  
**Social Security Number (TYPE)**

\_\_\_\_\_  
**Signature of Employee**

\_\_\_\_\_  
**Date Training Completed**

\_\_\_\_\_  
Supervisor's Name (TYPE name)

\_\_\_\_\_  
Date Certification sent to ED

\_\_\_\_\_  
Signature of Supervisor

\_\_\_\_\_  
Agency Name/Agency #

Date Received by Education: \_\_\_\_\_

Rev. 5/09

**B. Security Awareness**



**Certification of Security Awareness Training  
U.S. Department of Education – 2009 Collections Contract**

I **certify** that I have completed Security Awareness training as required by the U.S. Department of Education (ED’s Information Assurance Security Policy, OCIO-01; SOW 2.2, 6.2.6)

I **certify** that the Security Awareness training discussed and incorporated security protocols related to physical, system, personnel, equipment and data (electronic and hardcopy) elements. The training also specifically addressed incident response and handling procedures.

I have been **informed and understand** security violations must be reported to the Department of Education within 1 hour of identification.

I **understand** that I am required to take Security Awareness training within 10 business days of ED contract employment and cannot begin any collection activity on ED accounts until I have completed the training.

I also **understand** that I must complete annual Security Awareness training by July 15 of each subsequent year.

I **will consult** with a supervisor or, when appropriate, an ED Monitor, if in doubt on a specific security issue. If others ask me to violate security protocols, I **will decline** and report the incident to my Supervisor or Project Manager immediately.

\_\_\_\_\_  
**Employee (TYPE name)**

\_\_\_\_\_  
**Social Security Number (TYPE)**

\_\_\_\_\_  
**Signature of Employee**

\_\_\_\_\_  
**Date Training Completed**

\_\_\_\_\_  
**Supervisor’s Name (TYPE name)**

\_\_\_\_\_  
**Date Certification sent to ED**

\_\_\_\_\_  
**Signature of Supervisor**

\_\_\_\_\_  
**Agency Name/Agency #**

**Date Received by Education:** \_\_\_\_\_

Rev. 5/09



## CHAPTER 17: PCA MONTHLY REPORTS

PCAs are required to provide periodic reports outlining a variety of information necessary in portfolio maintenance, oversight and compliance, and internal reporting.

### 1. GENERAL REQUIREMENTS

Current reports include:

- Quality Control Report;
- Management and Fiscal Reports;
- Project Staff Report
- Correspondence Report
- Misdirected Payment Report
- Security Awareness Training Report

The PCA shall prepare and furnish one “electronic” copy of the required reports to the COR, Assistant COR and appropriate ED Monitor in the Atlanta Regional Office. All reports are due by the fifteenth (15<sup>th</sup>) day of the following month (by next business day if the 15<sup>th</sup> falls on a weekend/holiday).

All samples of reports can be found on the PCA Collections Website under the Library section. Reports are based in Excel and must contain all required data in the exact order and format requested by ED.

**Please Note:** ED reserves the right to modify or adjust all required reports, add additional reports and/or alter time frames as necessary. PCAs shall provide adhoc reports as requested by ED.

**Reference:**

- SOW 5.2
- Sample Reports – PCA Collections Website - Library

### 2. QUALITY CONTROL REPORT

Each PCA will have established Quality Control measures to review contractual requirements. For each electronic Quality Control Report, the PCA shall incorporate Quality Control categories

that include the size of the sample, the numbers and types of problems found, and all corrective actions taken.

Quality Control Categories must include:

- Monitoring of collector/customer service calls
- Correspondence for proper handling/response
- Administrative Wage Garnishment (AWG)
- (b)(7)(E)
- Account balances on PCA's computer system vs. ED-System
- Administrative Resolutions (both submissions to ED for review and approval and electronic file transfer data to the ED computer Contractor)
- Loan Consolidation Verification Certifications (LVC)
- All Electronic File Transfer information prior to mailing/transmission (Account Updates (name, address, phone numbers, employment), Letter History Updates, Billing, Account Return, etc.)
- Training: Date of Training, Topic, Attendees, and Results of Test Given. This data should be available during agency reviews. Specific training includes:
  - Privacy Act (including Privacy Act Statement completed and mailed to ED)
  - FDCPA (including fact that employees took test and passed)
- ED Policies, Procedures and new initiatives (including fact that employees took test and passed.)

### **3. MANAGEMENT AND FISCAL REPORT**

The Management and Fiscal report is designed to monitor Task Order performance. This report must be considered a part of the PCA's measuring system for its quality control plan.

At a minimum, this report must contain the following items:

- Information on dollars collected (current month and year-to-date).
- Number of "accelerated" rehabs processed each month, along with a break down of the number of days between the first and last payments for accounts in specific numerical groupings as defined by ED.
- Monthly rehabilitation queue totals (number of accounts and P&I total of accounts where the borrower has completed at least the first 5 payments towards rehabilitation to include an overall total, as well as, Direct and non-Direct totals)
- Information (including corrective actions) on any problems incurred by the PCA during the month and a status update on any outstanding problems from previous months.
- The number of complaints received each month;

- For each complaint, the PCA must provide: a brief summary of the complaint issues, whether the complaint was determined to be valid or invalid, the date received and the name of the collector involved.
- Discuss the work performed over the month just completed
  - Including manpower requirements, administrative resolution, litigation, collections, AWG, etc. and report on projected activity for upcoming month(s).
- A schedule of all update training conducted during the month and a brief synopsis of the subject matter covered in each training session.
- Pertinent information that needs to be brought to the attention of the Contracting Officer
  - Example - late EFTs, information regarding outstanding issues awaiting an ED response, etc.

#### **4. PROJECT STAFF ROSTER REPORT**

An electronic project staff roster must detail:

- All individuals employed,
- ED contract hire date
- Security level status requested
- E-Quip (security clearance website) release date
- Individuals no longer employed, including separation date.
- Employee SSNs when requested by ED (ED may require SSNs to be submitted in a separate format and at different intervals)

#### **5. CORRESPONDENCE REPORT**

An electronic Correspondence Report must contain the following:

- A list of all correspondence received for a given month broken down by:
  - The borrower's account number,
  - Type of correspondence by code (financial statement, general inquiries, powers of attorney, returned disability applications, etc.), and
  - An optional comments section.
- Current correspondence categories and codes to be utilized include:
  1. AWG - All correspondence pertaining to the AWG process (hearings, pay stubs for VPY, fin statements, etc.)

2. AR - Admin resolution documentation (BNK/DIS/INCAR/DEA - applications, letters, certificates, etc.)
3. CPL - Complaints
4. ER - Employer verification documentation
5. CD - Cease and desist/do not contact
6. MP - Misdirected payments
7. DV - Dispute/Verification (validity request/pnote request/payment history/incorrect balance/wrong party); also include cancellations - closed school, ATB, false certifications, etc.
8. DP - Disclosure permission (POA, auth to speak to third parties/attorney, etc.)
9. PC - Program Correspondence (all docs associated with rehab/consolidation process - agreement letters/LVCs/financial documents, etc.)
10. AC - All Attorney correspondence
11. RPY - All correspondence related to non-program/AWG repayments - financial docs, W-2s, compromises, repay requests, etc.
12. TOP - TOP related inquires/issues
13. TPR - Third party requests, inquires from outside agencies
14. BL - Borrower letters (NOT listed in other categories - requests for info, questions, Title IV letters, SIF, BIF, refusal to pay, etc.)
15. MIS - Miscellaneous (any correspondence not falling in categories listed above)

## **6. MISDIRECTED PAYMENT REPORT**

An electronic Misdirected Payment Report must contain the following:

- All misdirected payments received during the previous month.
- For each payment, the report will contain:
  - The borrower's account number,
  - The date the payment was received, and
  - The payment amount.

## **7. SECURITY AWARENESS AND PRIVACY ACT TRAINING REPORT**

An electronic Security Awareness and Privacy Act Training Report must contain the following:

- Employee name

- Email address,
- Company name
- Job title
- Training course identification
- Date of last security awareness and privacy act training

## **CHAPTER 18: INFORMATION SECURITY**

The purpose of this Chapter is to provide an overview of the Department's security procedures. These procedures basically cover the information security controls and policies that we are required to comply with, as we must ensure adequate protection of our Information Technology resources. Also, these procedures serve as a way to ensure that all PCAs know their security responsibilities and know what actions they may have to take to meet the Department's security requirements.

Additionally, PCAs must meet and maintain all FISMA requirements in order to maintain certification and accreditation (C & A) to access and work with ED systems. Please see Chapter 19 and the SOW 6.2 for more information.

Section 3 also lists additional documents (as listed in the SOW) that provide the detail, structure and support necessary to ensure that PCAs adhere to proper security protocols.

### **1. BASIC SECURITY REQUIREMENTS**

The security requirements listed below are items, which ED is required to do. The PCAs may be expected to do/comply with the following:

(b)(7)(E)



(b)(7)(E)

Reference: SOW 6.2.4 Physical Security

(b)(7)(E)

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(b)(7)(E)

**Reference:**

- SOW 6.2.8.1 Identification and Authentication
- SOW 6.2.8.2 Access Control
- SOW 6.2.8.3 Auditing
- SOW 6.2.8.4 Flaw Remediation
- SOW 4.4; 6.2.8.5 Closeout/Disposal

### 3. **REFERENCES**

ED computer systems must adhere to the Federal security requirements detailed in the publications listed below. The following laws, regulations or policies establish minimum requirements for system security:

#### **A. Federal Laws and Regulations**

- FIPS 46-3 DES
- FIPS 46-3 Triple DES
- FIPS 140-2 Security Requirements for Cryptographic Modules
- FIPS 185 Escrowed Encryption Standard
- FIPS 186-2, Digital Signature Standard (DSS)
- FIPS 197 AES
- FIPS 199 Standards for Security Categorization of Federal Information and Information Systems
- Electronic Communications Privacy Act of 1986, Public Law 99-08, 100 Stat. 1848
- E-Government Act of 2002
- Freedom of Information Act, 5 United States Code 552, Public Law 93-502
- Privacy Act of 1974, 5 United States Code 552a, Public Law 99-08
- Federal Information Security Management Act (FISMA)
- OMB Circulars A-130 Appendix III
- HSPD #7 Critical Infrastructure Protection

#### **B. NIST Special Publications**

- NIST 800-12 (An Introduction to Computer Security: The NIST Handbook)

- NIST 800-14 (Generally Accepted Principles and Practices for Securing Information Technology Systems)
- NIST 800-16 (Information Technology Security Training Requirements: A Role and Performance-Based Model)
- NIST 800-18 (Guide for Developing Security Plans for Information Technology Systems)
- NIST SP 800-21 (Guideline for Implementing Cryptography in the Federal Government)
- NIST 800-26 (Security Self-Assessment Guide for Information Technology Systems)
- NIST 800-30 (Risk Management Guide)
- NIST 800-34 (Contingency Planning)
- NIST 800-37 (Guidelines for the Security Certification and Accreditation of Federal Information Technology Systems)
- NIST 800-47 (Security Guide for Interconnecting Information Technology Systems)
- NIST 800-53 and 800-53A (Recommended Security Controls for Federal Systems)
- NIST 800-60 (Guide for Mapping Information Systems)
- NIST 800-61 (Computer Security Incident Handling Guide)

### **C. Departmental of Education Policies and Procedures**

- U.S. Department of Education Information Technology Security Policy
- U.S. Department of Education Information Assurance Security Policy
- U.S. Department of Education, Information Technology Security Manual, Handbook Number 6
- Federal Student Aid Immediate Action Memorandum: Sensitive Data Protection on Portable Devices
- U.S. Department of Education, Personnel Security-Suitability Program, Handbook Number 11
- U.S. Department of Education, Incident Handling Guide
- U.S. Department of Education Risk Assessment Procedures
- U.S. Department of Education IT Security Configuration Management Procedures Handbook
- U.S. Department of Education Contingency Planning Procedures
- Payment Card Industry Data Security Standard (PCI DSS)

Reference: SOW 6.2.1 Rules and Regulations

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Distribution authorized to the Department of Education and its Private Collection Agency contractors only. Other requests shall be referred to the Federal Student Aid Acquisitions Group.

## **CHAPTER 19: PRIVATE COLLECTION AGENCY COMPLIANCE (INSPECTIONS)**

The Department of Education has the ultimate responsibility to ensure that the Department of Education's private collection agencies (PCAs) adhere to and follow all applicable laws, contractual requirements, and ED policies and procedures as provided within the collection contract, ED policy manuals/notices, regulations and training materials. Due to the large number of borrowers, the immense dollar value of the ED default portfolio, the sizable agency payments, and the great importance to sustain existing federal student loan programs, PCA oversight and compliance is a crucial necessity needed to maintain Congressional and taxpayer confidences.

With many different agencies (both small and large), diverse work functions, and multiple ED offices, proper oversight is achieved through a myriad of approaches. Through normal day-to-day interaction, various ED offices become aware of PCA issues that may be handled directly with the office in question, or may get routed to the PCA compliance office and/or COR's office for resolution. Some of the most obvious compliance opportunities include, but are not limited to: agency reviews, remote call monitoring, and independent audits.

### **1. AGENCY REVIEWS**

ED will periodically conduct agency reviews to monitor, assess and correct (if necessary) agency compliance with regards to contractual, regulatory and procedural requirements.

Some common agency review elements include:

- Type
  - off-site or on-site
- Notification
  - Announced or unannounced
- Location
  - Main office, satellite office, subcontractor
- Review items
  - Most reviews incorporate several topical areas
  - Some areas are follow-up items from previous reviews
- Review reports/formats
- Corrective actions/responses

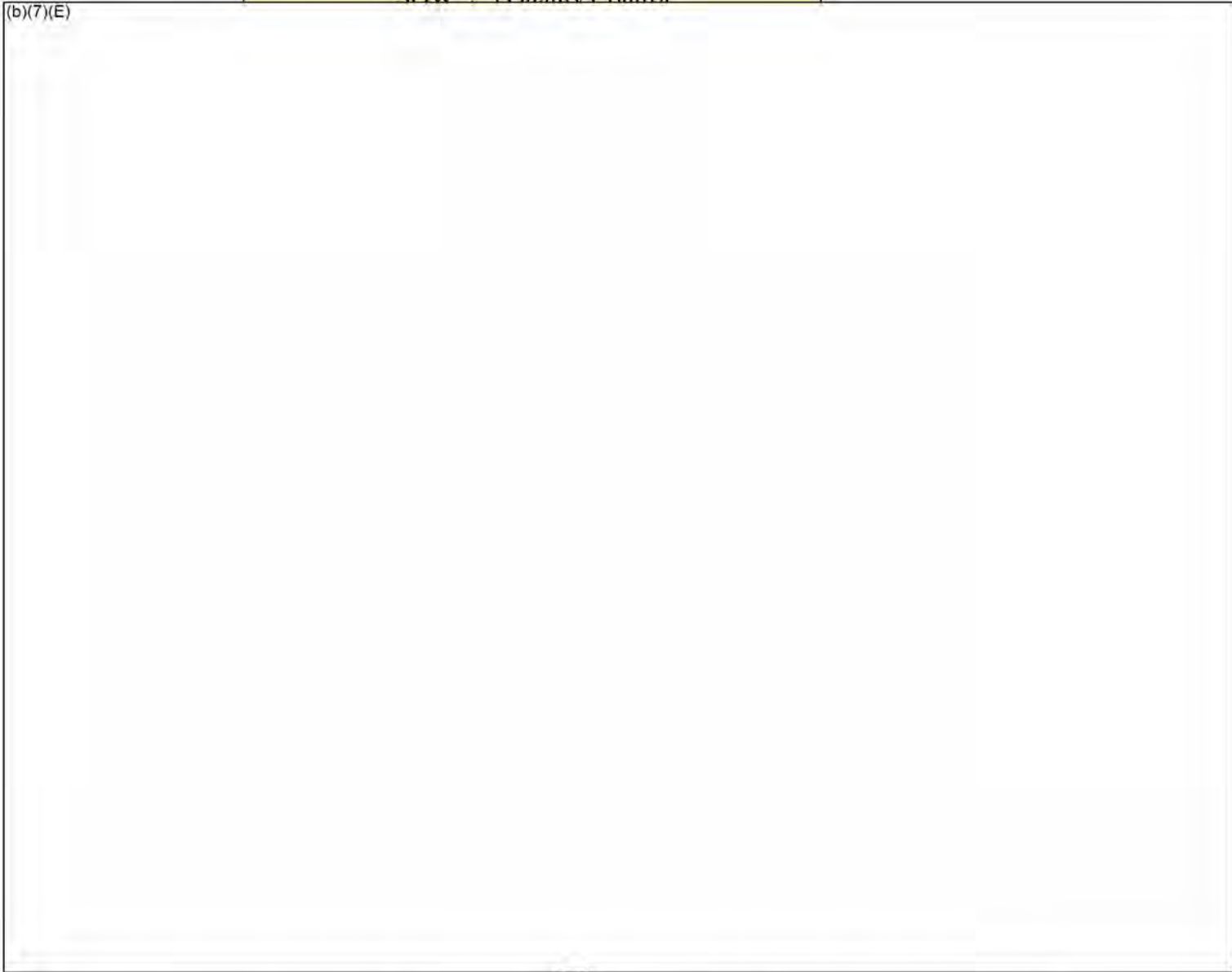
In addition to regularly scheduled reviews, some agencies may receive ad hoc reviews due to potential concerns discovered by or brought to ED's attention. Agencies are expected to work diligently and cooperatively with ED during all reviews to address, and ultimately correct, any findings or deficiencies.

(b)(7)(E)



References:  
RFQ, E.1 Inspections;  
SOW 2.3 Quality Control

(b)(7)(E)



(b)(7)(E)



**3.**

**FISMA CERTIFICATIONS**

**A. Authority to Operate**

All PCAs must have an Authority to Operate (ATO) from the FSA CIO Office by 9/30/09 to work on the 2009 ED Collections contract. In order to receive this designation, PCAs must have:

- Completed a Privacy Impact Assessment (PIA)
- System Security Plan Approval
  - Completed a Security Authorization Boundary Document

(b)(7)(E)



- Developed a System Security Plan (SSP)
- Independent Audit of the SSP
- SSP updates thru audit findings
- SSP submission to ED
- ED SSP approval

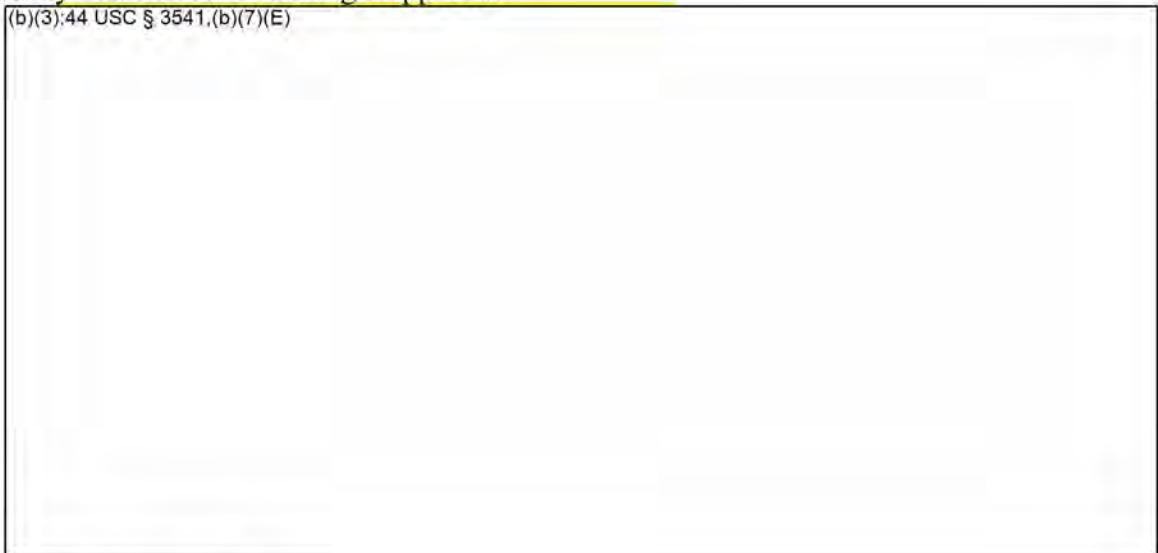
➤ Security Assessment Plan Approval

○ (b)(3):44 USC § 3541,(b)(7)(E)



➤ Security Authorization Package Approval

(b)(3):44 USC § 3541,(b)(7)(E)



**B. Certified and Accredited**



PCAs must be Certified and Accredited (C & A) by FSA's CIO Office for continued

(b)(3);44 USC § 3541,(b)(7)(E)

- Reference: SOW 6.2.1; NIST Pub 800-47 (interconnection agreements); NIST 800-53A (Security Controls for Federal Systems); Federal Information Security Management Act (FISMA); FSA CIO FISMA

#### 4. **CHECKS & BALANCES**

All agencies should be aware that all processing, communication and interactions with the PCAs are subject to review and analysis. All work products, reports and documentation/data provided by or based upon PCA work may be scrutinized by ED for compliance purposes within all ED offices. Review items, follow-up reviews and/or ad hoc reviews are never stagnant and will constantly shift depending upon potential concerns, risk assessments and/or compliance schedules.

Above all, agencies should be conducting their own monitoring and quality control reviews to improve and prevent problems from arising. As always, any concerns discovered by an agency should be noted in the appropriate monthly reports and promptly provided to the appropriate ED official. For monthly report information, please see Chapter 17.

## CHAPTER 20: CONTACT & RESOURCE INFORMATION

The following information is provided to assist agencies in identifying where or to whom to direct questions pertaining to a variety of issues under the ED collection contract.

**\*Please note: if unsure whom to speak with or where to go for help, PCAs are encouraged to contact their main Point-of-Contact in the Atlanta Regional Office for assistance.**

### 1.

#### PCA WEBSITE

Nonresponsive

The PCA website is the primary resource for information related to ED's collection contract. The website contains a myriad of pertinent data including:

- Current & Past Performance Statistics
- Contract Administrator Notices (policy guidance)
- On Line IMFs to Vangent
- Manuals, training materials, worksheets/forms
- Statement of Work and RFQ

Website Address: <http://www.fsacollections.ed.gov/contractors>

### 2.

#### REGIONAL OFFICES

Atlanta Regional Office (Region 4)  
U.S. Department of Education  
Federal Student Aid  
61 Forsyth Street, SW, Room 19T89  
Atlanta, GA 30303  
Phone – 404-562-6012  
Fax – 404-562-6059

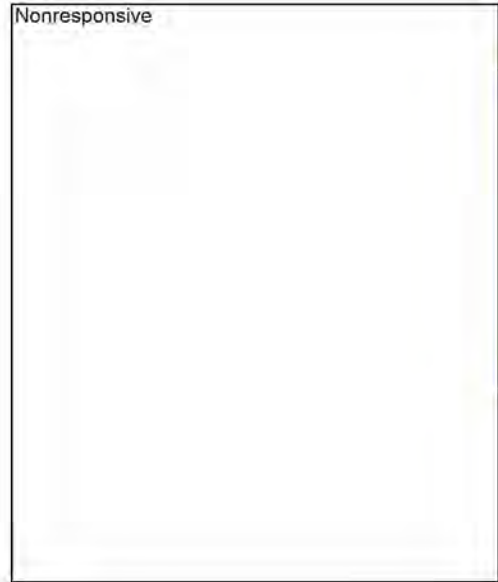
Functions include:

- Main Contact for PCAs
- Technical Assistance
- Voucher Preparation
- PCA Letters & Forms approval
- On Site & Off Site Reviews
- Administrative Resolutions approval
- Borrower Account maintenance (IMFs)

- Administrative Wage Garnishment validation and compliance

Chicago Regional Office (Region 5)

U.S. Department of Education  
 Federal Student Aid  
 500 W. Madison Street, Suite 1520  
 Chicago, Ill 60661  
 Phone – 312-730-1477  
 Fax – 312-730-1457



Functions include:

- Treasury Offset Program Hearings
- Administrative Wage Garnishment Hearings
- Escalated Issues

San Francisco Regional Office (Region 9)

U.S. Department of Education  
 Federal Student Aid  
 50 Beale Street, Room 8601  
 San Francisco, CA 94105  
 Phone – 415-486-5633  
 Fax – 415-486-5669

Functions include:

- Litigation review
- U.S. Attorneys Liaison
- Closed School Requests
- Ability to Benefit Requests
- Unauthorized Signature Requests
- Oversee ECMC Bankruptcy issues

**3. WASHINGTON D.C.**

U.S. Department of Education  
 Federal Student Aid  
 830 First Street, NE  
 Washington, DC 20202

Contracting Officer for Unrestricted Pool – John Ramsey (john.ramsey@ed.gov)

Contracting Officer for Small Business Pool – Christina Douglas  
(christina.douglas@ed.gov) Contracting Officer’s Representative (COR) – David Bush  
(david.bush@ed.gov)  
and Lawannah Howell (Lawannah.Howell@ed.gov)  
Security Officer – Greg Plenty (Gregory.Plenty@ed.gov)

**4. CUSTOMER SERVICE HELP DESKS**

(b)(3);44 USC § 3541,(b)(7)(E)

nonresponsive

**Customer Call Center for Borrowers** (Vangent): 1-800-621-3115  
➤ Handle in-house accounts  
➤ Assist with dispute resolution

The customer call center number is for borrower use only and must not be

**5. PAYMENT AND CORRESPONDENCE ADDRESSES**

- Regular Borrower Payments:
- Address for borrowers to send payments by Overnight Services:

National Payment Center  
U.S. Department of Education  
P.O. Box 105028  
Atlanta, GA 30348-5028

Bank of America  
C/O Dept. of ED-105028  
1075 Loop Road  
Atlanta, GA 30337

- Wage Garnishment Payments - Garnishment Payments from Employers:

National Payment Center  
U.S. Department of Education  
P.O. Box 105081  
Atlanta, GA 30348-5081

➤ Documents for Panagon System that Require Response from Vangent:

CSB – Panagon System  
U.S. Department of Education  
6201 Interstate 30 Highway  
Greenville, TX 75402

\*\*\*Should Not Contain Payments

➤ Documents that ONLY need to be imaged into the borrower's file

CSB – SSU  
U.S. Department of Education  
6201 Interstate 30 Highway  
Greenville, TX 75402

(b)(7)(E)

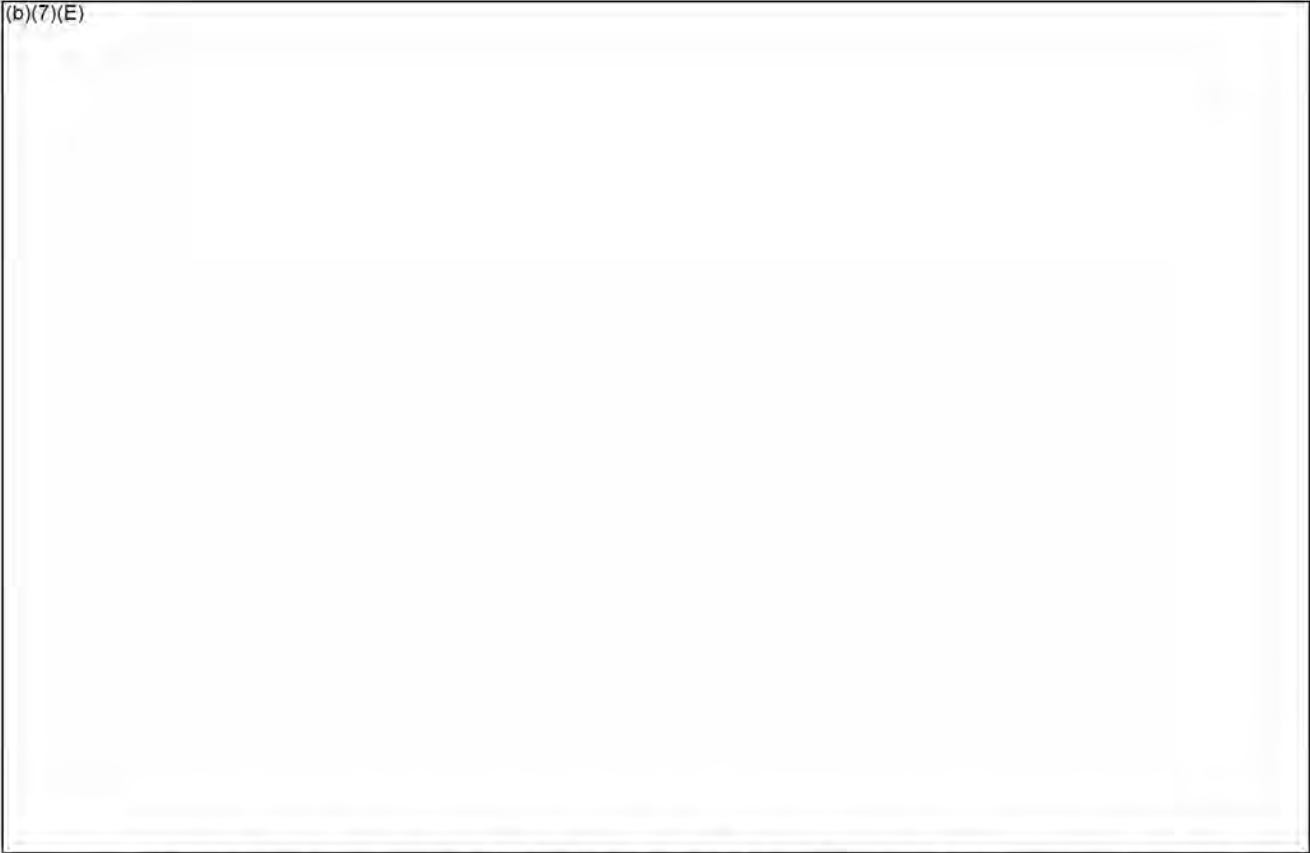
- SSU sheet must also be included

\*\*\*\*\*

**\*\*PCAs should designate limited number of staff, (key personnel, managers) to communicate with Department of Education staff.**

**CHAPTER 21:  
AD HOC FILES FOR PCAs**

(b)(7)(E)



In an effort to streamline the handling of AWG hardship and VPY accounts, we are implementing a new system to monitor these accounts. Please implement the following procedural changes immediately:

1) Hardships will require review and renewal every six months unless there is documented evidence that the borrower's hardship will last longer than six months. For example, if the borrower provides evidence that a child support order that is creating hardship will remain in force for 12 months, the hardship status will expire at the time the support order expires (12 months). However, in no instance will an account be allowed to remain in a hardship status for more than 2 years without review and renewal. The ED

hearings official (not the PCA) will indicate the hardship expiration date as follows on th

(b)(7)(E)

2) Voluntary payment (b)(7)(E) agreements will require review and renewal every 12 months unless the account is projected to be paid in full less than 12 months from the scheduled review date. (b)(7)(E)

(b)(7)(E)

3) At the point a hardship or (b)(7)(E) review is needed, the new system will automatically generate a (b)(7)(E) letter to the borrower, unless either of the following is true:

(b)(7)(E)

In either instance where a (b)(7)(E) is not sent, the account will be written to a TSO worklist (see #5 below) so the PCA can take appropriate action.

4) If/when the borrower responds to the (b)(7)(E) by providing current financial information, the PCA should review the financial information and take appropriate action. If the PCA determines that the current hardship or (b)(7)(E) status is still valid, the PCA must annotate the (b)(7)(E) as follows:

(b)(7)(E)

5) If (b)(7)(E) days after the (b)(7)(E) issuance, the PCA has not confirmed that the status is valid (and has not changed the status), the account will be written to a TSO worklist so the PCA can take appropriate action. (b)(7)(E)

(b)(7)(E)

(b)(7)(E)





(b)(7)(E)



## COMMENTS

Any comments, corrections, suggestions should be sent to:

Lawannah Howell  
[lawannah.howell@ed.gov](mailto:lawannah.howell@ed.gov)  
404-562-6004

U.S. Department of Education  
61 Forsyth St., SW  
Room 19T89  
Atlanta, GA 30303

