Lender/servicer FAQs for the Tennessee Student Assistance Corporation (TSAC) guarantor portfolio transfer to Educational Credit Management Corporation (ECMC)

May 5, 2016

As you may be aware, the U.S. Department of Education approved the Tennessee Student Assistance Corporation's (TSAC) request to transfer the guarantee of their Federal Family Education Loan Program (FFELP) portfolio to another FFELP guarantor. Effective July 1, 2016, Educational Credit Management Corporation (ECMC) will be designated as the guarantor of the FFELP portfolio previously held by TSAC.

The transition of the TSAC portfolio, currently serviced by Nelnet Guarantor Solutions (NGS), is planned to begin on June 1, 2016, with an anticipated completion date of July 1, 2016. Upon the completion of the transfer, ECMC will perform all services as the guarantor.

The following topics are bookmarked to take you directly to each section within the FAQs:

Guarantor code change Claims Electronic file transmissions (CAM, Lender Manifest) CAM Claims (50 Series) processing Manual Ioan maintenance updates Default aversion Bankruptcy court proof of claim protocol ECMC system access ECMC lender agreement FAQ updates

Guarantor code change

## Will the former TSAC portfolio guarantor code change?

Yes. The former TSAC portfolio will be identified using the ECMC guarantor code of 951.

## Claims

## When should TSAC claims be sent to ECMC?

Beginning June 1, all claims and related documents, including Teacher Loan Forgiveness requests, partial discharge request and supplemental claims, should be sent to ECMC. The address for manual claim filing is:

ECMC Claims 10370 Peter A. McCuen Blvd Mather, CA 95655 ECMC will hold these claims until the transition is complete. Once the transition is complete, ECMC will begin processing these manual claims and ensure they are paid timely.

## During the transition period–June 1 through the beginning of July–will claims be paid?

During the month of June, NGS will be responsible for paying claims submitted to them prior to June 1. Claims submitted to ECMC will be held until the transition is completed at the beginning of July.

## Where should claim recall requests be submitted?

For claims submitted to NGS prior to June 1, the recall requests should be sent to NGS as you do today. For claims submitted to ECMC on or after June 1, the recall requests should be sent to ECMC.

# How will the claim recall process work during the transition if the claim is not loaded until the transition is completed?

ECMC recalls will be processed after the transition is completed. Recall requests should be submitted to <u>recallrequest@ecmc.org</u> or by faxing the recall requests to 916-526-7393.

# For manual claims submitted on or after June 1 to ECMC, how will the guarantor and servicers track receipt dates and what will be used as confirmation of receipt?

ECMC will acknowledge the receipt of the manual claim(s) by returning the transmittals back to the lender/servicer via fax or secure email.

## Who at ECMC should we contact regarding TSAC claims?

Please contact Tracy Roberts at troberts@ecmc.org or at 916-526-7367.

## Electronic file transmissions (CAM, Lender Manifest)

# Should electronic files currently transmitted to NGS be directed to ECMC for the former TSAC (747) guarantor portfolio?

Beginning June 25, all electronic file transmissions should be directed to ECMC. The files received by ECMC between June 25 and June 30 will be held until after the conversion is completed. Files will be processed on ECMC's system in date timestamp order.

## What transmission file names should be used when sending files to and from ECMC?

ECMC adheres to the NCHER industry standard naming convention specific to the file type in regards to electronic file processing.

## Can the lender/servicer submit CAM and Lender Manifest files under the TSAC guarantor code?

Yes, ECMC will accept and process CAM and Lender Manifest files submitted under the 747 TSAC guarantor code.

Will ECMC identify if a CAM file transmission was not received during the hold period from June 25 to June 30?

CAM files are generated by the lender/servicer; the lender/servicer is responsible for reconciling the file acknowledgement and accepted/rejected transactions to ensure files were received and processed. ECMC will send CAMC and CAMR files on held files after they have been processed.

We have more CAM record types in production with ECMC than with NGS for TSAC. Can we automatically begin processing the additional record types with ECMC?

Yes, with the exception of the CAM Claim 50 Series record types. Please see CAM Claims (50 Series) processing below for additional details regarding CAM Claims.

## CAM Claims (50 Series) processing

As a lender/servicer, we currently have CAM Claims set up with ECMC. Can we send our claims to ECMC using CAM?

During the transition, please send your claims manually to ECMC. After July 1, once the TSAC transition is complete, lenders/servicers may file CAM Claims on the former TSAC loans.

If you have questions about the timing of this process, please contact Tracy Roberts at <u>troberts@ecmc.org</u> or at 916-526-7367.

Manual loan maintenance updates

Where do I submit manual loan transaction updates (e.g., loan status changes, cancellations, lender/servicer changes, etc.)?

Effective June 25, please send any manual loan transaction updates via secure email to <u>lenderservices@ecmc.org</u>.

## Default aversion

#### How will updating DAARs be affected?

These updates (CAM files and manual DAARs) will be held beginning June 25 through the anticipated completion of conversion on July 1. The CAM DAARs will then be processed in the order they are received. On July 5, ECMC will begin processing the manual DAARs in the order they were received.

#### Where should we submit our manual DAAR requests?

Beginning June 25, please submit manual DAAR transactions to ECMC via secure email to <u>PredefaultProcessing@ecmc.org</u>.

## Will manual DAARs be processed in the order they were received? What date will be used for processing the files?

Manual DAARs will be processed in the order received and the actual receipt date will be used to load these files to ECMC's system after the data conversion is complete.

# Will ECMC acknowledge receipt of all manual DAARs submitted to the <u>PredefaultProcessing@ecmc.org</u> mailbox?

Yes, ECMC will complete the transmittal form after the DAAR is processed and reply via secure email.

If we are approaching a borrower's 120th day of delinquency, how do we ensure there will be no penalties assessed to the lender/servicer if the DAAR transaction is not processed on ECMC's system by the 120th day of delinquency?

Transactions/files will be processed using the receipt date of the transaction/file as the actual receipt date for the transaction. For example, if a DAAR is received on day 117 of delinquency, but not loaded into the system until day 125 of delinquency, there will be no penalty because the actual date of receipt will be reflected. This also applies to manually submitted DAARs.

## Will ECMC accept a CAM record/file as proof that the DAAR was sent on time?

If it is necessary to verify the date of receipt of a DAAR, ECMC will assist the lender/servicer in researching and confirming the actual receipt date of the file/transaction.

## When should a DAAR cancellation be submitted to ECMC?

Lenders/servicers should submit DAAR cancellations to ECMC when the loan becomes zero days delinquent.

## Bankruptcy court proof of claim protocol

## Is there a new protocol for filing a proof of claim with a bankruptcy court on former TSAC borrowers?

As you know, the lender/servicer must file a proof of claim with the bankruptcy court no later than 30 days after it receives the Notice of the First Meeting of Creditors (Notice)—unless the Notice specifically stated that a proof of claim is not required.

Beginning June 1, all bankruptcy claims should be sent to ECMC, as the new guarantor of the former TSAC portfolio. When filing the proof of claim with the court for former TSAC borrowers, the following ECMC guarantor information should be used for both the notice and payment address:

Bankruptcy notices:

ECMC P.O. Box 16408 St. Paul, MN 55116-0408

## Bankruptcy payments:

ECMC Lockbox #8682 P.O. Box 16478 St. Paul, MN 55116-0478

For those proof of claims already filed with the court using the old address, ECMC will process the bankruptcy claims and then submit a notice of assignment with the court.

If you have questions regarding the proof of claim filing, please contact Yolanda Jones, at <u>yjones@ecmc.org</u> or at 651-325-3355.

## ECMC system access

## Online access to ECMC Direct

Lenders and servicers with current access to ECMC Direct may continue to login with their existing user ID and password. Effective July 5, the ECMC portfolio, including the former TSAC portfolio, will be viewable via ECMC Direct.

If you do not have an existing ECMC EPIC Direct username and password, please contact <u>lenderservices@ecmc.org</u> to submit a request.

### ECMC's Online Reporting tool

If you currently access the ECMC Online Reporting (OLR) tool, no access changes will be required.

If you do not currently have access to OLR, please contact ECMC Customer Service at lenderservices@ecmc.org or at 888-221-3262 and select option 3.

## ECMC lender agreement

#### Is a new lender agreement needed with ECMC?

For those lenders that have lender agreements with ECMC, a new lender agreement will not be needed for the portfolio previously held by TSAC. However, if the ECMC lender agreement does not list all of the lender's current codes, the additional lender codes will need to be added. If the lender does not have an ECMC lender agreement, a new lender agreement will need to be executed. Lender agreement inquiries should be sent to lenderservices@ecmc.org.

## FAQ updates

ECMC will add any additional FAQs to our website. If you have any questions you would like addressed in the FAQ, please submit them to <u>lenderservices@ecmc.org</u>.

Please check our website, <u>www.ecmc.org</u>, for ongoing updates about the transition.