

**From:** Tommy Sims <TSims@khec.com>  
**Sent:** Friday, December 4, 2009 4:34 AM (GMT)  
**To:** James Blackburn <JBlackburn@khec.com>  
**Subject:** RE: 2008 CDR  
**Attach:** FY 2007 Final chart numerator denominator challenges included 9 14 09 (2).xls

**Redacted by HELP Committee**



**Tommy C. Sims**  
**Director of Default Mgt. & Strategy**  
Kaplan Higher Education Corporation  
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**From:** Redacted by HELP Committee  
**Sent:** Thursday, December 03, 2009 10:05 PM  
**To:** Tommy Sims  
**Subject:** 2008 CDR

Tommy,

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Also, with the three year CDR, have they increased the number of deferments or forbearances a student is eligible to receive. Under the two year plan, we could use deferments or forbearances to get out of danger. Can we do the same for the 3 year CDR? (There has not been any changes in the length of the deferment/forbearance max time usage availability between the 2yr CDR and the 3 yr CDR.)

If a student was unable to make a single payment for all three years, how would we eliminate a default? If not possible, what does the model look like. (If a person makes one payment and it reduces the number of days delinquent to less-than 270 FFELP or less-than 360 days delinquent FDLP thus the claim cannot be filed with the GA and if done each of the 3yrs thereby avoiding a default claim.)

Thanks,



**James Blackburn**  
**Vice President, Financial Aid**

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