INTENT TO AWARD

Student Loan Billing Services

The WV Higher Education Policy Commission (Commission) currently has several grant programs that require the use of a Student Loan Billing Service. In 2008, the Commission released a Request for Proposal (RFP) for Student Loan Billing Services for a 5-year contract. At that time, only one vendor responded: Educational Computer Systems Inc. (ECSI). The contract was awarded to ECSI. When the contract expired, the dollar amount of the usage was such that the Commission was not required to request bids so the Commission entered into a new contract with ECSI.

In the 2019 WV Legislative session, Senate Bill 1 passed creating a new "WV Invests Grant Program". This program is much further reaching than previous/current grant programs. The Commission believes that our usage of a Student Loan Billing Service will significantly increase. To that end, the Commission needs to award a new contract for Student Billing Loan Services.

Because of our past history of vendor bid responses and due to the very restricted timeframes, the Commission intends to contract with ECSI unless another service provider objects.

A list of bid requirements has been created. Any vendor who would desire to bid for these services would need to meet the criteria as described. The bid requirements follow.

If after reviewing the required criteria, a vendor wishes to be given the opportunity to bid for these services, they must notify the Commission by April 3, 2019 by 3:00pm. The contact person for the Commission is:

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WV HIGHER EDUCATION POLICY COMMISSION

BID REQUIREMENTS

STUDENT LOAN BILLING SERVICES

I. INTRODUCTION

The West Virginia Higher Education Policy Commission (Commission) is soliciting proposals from qualified vendors to provide Student Loan Billing Services for the Division of Financial Aid. Commission is a state government agency located in Charleston, WV. The Commission maintains oversight of higher education institutions in West Virginia and is responsible for administering over $100 million in financial aid each year and currently maintains 582 active loans with over 900 in an in school or grace period. The Commission's Student Loan Portfolio totals over $6 million. The legislature created the WV Invests Grant, which is a program that will award $10 million annually and require recipients to reside in West Virginia for two years after program completion or repay the funds.

The Commission is interested in partnering with the best-qualified Student Loan Billing Servicer to provide state-of-the-art services and solutions for Commission staff and our borrowers. To that end, the Commission requires that the chosen Student Loan Billing Servicer be able to meet the requirements indicated herein, provide for expansion and service enhancement needs, and represent the best balance of benefits to costs to the Commission.

Commission's requirements include, but are not limited to, banking, billing, accounting, reporting, related services, and an interactive PC-based system, that will facilitate the consolidation of the Commission's need in the collection of loans from the Underwood-Smith Teacher Scholarship, West Virginia Engineering, Science and Technology Scholarship, the WV Center for Nursing Scholarship, the Health Sciences Service Program, and the WV Invests Grant. These programs have a service requirement. If the student does not fulfill the service requirement, the student must repay the scholarship.

II.   SCOPE OF SERVICES

The Commission seeks to contract with a vendor experienced in servicing student loan programs to provide a support system for the following Commission programs:

- ❑ Underwood-Smith Teacher Scholarship
    - o Underwood-Smith Teacher Scholarship Program is a student financial aid program designed to enable and encourage students to pursue teaching careers at the pre-school, elementary, middle or secondary school level.

- o Undergraduate and graduate scholarships, not to exceed $5,000 per academic year, are awarded on the basis of academic qualifications and interest in teaching. The purpose of the program is to assist West Virginians interested in obtaining a teaching certificate and committed to the pursuit of a teaching career in West Virginia's public schools. Due to limited funding, priority is given to junior, senior, and graduate students.

- ❑ West Virginia Engineering, Science and Technology Scholarship
  - o West Virginia Engineering, Science and Technology Scholarship Program is a student financial aid program designed to enable and encourage academically talented individuals to pursue careers in the fields of engineering, science and technology. Scholarships, not to exceed $3,000 per academic year, are awarded on the basis of academic qualifications and interest in the fields of engineering, science and technology. Priority is given to West Virginia residents.
  - o The purpose of the program is to assist West Virginians interested in obtaining a degree or certificate in engineering, science or technology and committed to the pursuit of a career in West Virginia.

- ❑ WV Center for Nursing Scholarship
  - o The WV Center for Nursing Scholarship is a student financial aid program designed to enable and encourage academically talented individuals to pursue careers in nursing. Scholarships are awarded on the basis of academic qualifications and interest in working as a nurse or teaching in a nursing program in West Virginia. Priority is given to West Virginia residents.
  - o The purpose of the program is to assist West Virginians interested in obtaining a degree in nursing and committed to the pursuit of a career in West Virginia.

- ❑ WV Invests Grant
  - o The WV Invests Grant is a student financial aid program designed as a last dollar grant to cover tuition and mandatory fees not covered by other federal and state financial aid. Recipients are required to reside in West Virginia for two years after program completion or pay the funds back plus interest and fees.

- ❑ West Virginia Health Sciences Service Program
  - o This a loan repayment program) for health professions students interested in practicing in underserved communities in West Virginia.

The vendor will provide the following services for all awards: maintaining contact with the borrower, processing deferments and adjustments to borrower's accounts, periodic

billing and other notifications, payment processing, loan reporting and training for loan personnel in the effective use of the vendor's program.

The program is expected to meet the following requirements.

1. **Customer Service**

   a. The Commission requires that our Student Loan Billing Servicer respond to all Commission and Borrower Telephone Calls, Email Inquiries, etc. within (24) hours of request.

   b. The Commission requires that all Payment and Entitlement Processing be complete within (24) hours of receipt.

   c. The Commission requires that all Payment Processing take place in "real-time" and *not within a batch process*.

   d. The Commission requires that our Student Loan Billing Servicer provide a free, automatic email notification to all borrowers when a payment, deferment/cancellation, and/or address change is processed.

   e. The Commission requires that our Student Loan Billing Servicer provide a free, automatic email notification to our delinquent borrowers when a payment has not been received by the required due date.

2. **Cash Management/Payment Processing**

   a. The Commission requires that our Student Loan Billing Servicer have the ability to calculate interest monthly.

   b. The Commission requires that our Student Loan Billing Servicer provide real-time data access and processing.

   c. The Commission requires that our Student Loan Billing Software be available 24x7, 7 days a week.

   d. The Commission requires that the Student Loan Billing Software offer a system with "on-line, real-time" functionality. The Commission requires that if the Internet

connectivity is lost for an undetermined amount of time, the Commission be able to access, and work within, a complete, active, copy of your Student Loan Billing Software, Data, and Programs until Server-Level and/or Internet Connectivity is re-established.

e. The Commission requires the ability to access an account through multiple Search Options. Access requirements include:

   1. Prior Accounts (i.e. Last 5 Accounts Accessed)
   2. Social Security Number (SSN)
   3. Chronologically by SSN
   4. Last (4) Digits of an SSN
   5. Student Identification Number (SID)
   6. Alphabetically by Last Name
   7. Partial Last Name and/or First Name
   8. Full Last Name and/or First Name
   9. Range of SSNs
   10. Range of Old SSNs
   11. Range of SIDs
   12. Maiden Name
   13. Archived Account
   14. Telephone Number (ex: Home, Work, Cell, etc.)
   15. Email Address (ex: School, Personal, etc.)

f. The Commission requires that our Student Loan Billing Servicer's Software have the ability to store Name and Address Changes per Borrower.

g. The Commission requires that our Student Loan Billing Servicer's Software have the ability to store References per Borrower.

h. The Commission requires that our Student Loan Billing Servicer's Software allow the Commission Staff to narrow down a borrower's Transaction History by opting to only view: New Loans & Advances, Deferments & Cancellations, Payments & Other Transactions, and/or All Transactions.

i. The Commission also requires that our Student Loan Billing Servicer's Software provide the ability for Commission Staff to *individually* remove a borrower's SSN from your billing statement upon request from a single borrower (assuming that the Commission has not universally made this a requirement for its entire Student Loan Portfolio).

j. The Commission understands the need to "archive" zero-balance accounts. However,

the Commission requires *instant* access (i.e. without requesting the information from the servicer) to *all* archived accounts and *all* information (e.g. not just Transaction History), as if the account was never archived at all.

k. The Commission requires that our Student Loan Billing Servicer's Software provide the ability for Commission staff to add Journal Voucher Entries to the system, on demand, for items such as Interest from Investments, Retained Earnings, etc.

l. The Commission requires that our Student Loan Billing Servicer create a Monthly Electronic Bill for *every* borrower, *every* month, year-after-year, that the Commission is a client - regardless of the borrower's preferred method of billing (i.e. Billing Statements, ACH, Coupon Books, eBill, etc.). This functionality should provide instant access to Commission Staff and our borrowers.

m. The Commission requires that our Student Loan Billing Service's Software maintain a month-by-month, 10-Year Perpetual Billing History on each borrower from the date the borrower enters Repayment.

n. The Commission requires that our Student Loan Billing Servicer's System track and instantly display both the *Deposit Amount* (i.e. Total Amount of the Check) and the *Amount* prorated towards each individual loan or debt type, when payments are applied to the system for multiple loans / debts.

o. The Commission requires that our Student Loan Billing Servicer's System allow a borrower to schedule Permanent ACH Payments (i.e. Recurring ACH Payments until the borrowers balance equals zero) *and* Temporary ACH Payments (i.e. Temporary ACH Payments for "X" number of months).

p. The Commission requires that our Student Loan Billing Servicer allow a borrower to schedule and make a one-time, on-demand, ACH Payment on any given day of the month.

q. The Commission requires that our Student Loan Billing Servicer's System generate an automatic Billing Statement when an ACH Borrower becomes delinquent due to an ACH-NSF (i.e. Non-Sufficient Funds).

r. The Commission requires that our Student Loan Billing Servicer's Software (and not a manual check by your Customer Service Representatives) have the ability to automatically stop the processing of an entitlement for which the borrower has already received the maximum amount of time allowed.

s. The Commission requires that our Student Loan Billing Servicer's Software contain

the Low Income School Directory, for a minimum of the last (5) years, to facilitate automation and save the Commission Staff time when processing Teaching Cancellations. In addition, your system must automatically notate the School Name, County Name, State and Year within Memos for instant access.

t. The Commission requires that our Student Loan Billing Servicer's Software allow the Commission's Staff to create an "Eligible Low Income Schools Report" based on a specific County and/or District that we select. The purpose of this report is to provide our borrowers with a customized listing of all "Eligible Schools" that they may teach at to qualify for a Teaching Cancellation within a specific area of the country.

u. The Commission requires that our Student Loan Billing Servicer's Software contain the Department of Education's OPEID Database to facilitate automation and save the Commission staff time when processing manual In-School Student Deferments. In addition, your system must automatically notate the School Name and OPEID Number within Transaction History for instant access.

v. The Commission requires that our Student Loan Billing Servicer's Customer Service Representatives and Website have the ability to accept Visa, MasterCard, and Discover Card, as a method of borrower repayment.

w. By utilizing the Student Loan Billing Servicer's Credit Card Processing Services, the Commission desires to have the option of passing any applicable Credit Card Payment Processing Fees along to the payer.

x. The Commission requires that our Student Loan Billing Servicer have the ability to provide our borrowers with Coupon Books as a method of repayment. Coupons should *only* be created and mailed to those borrowers whose accounts are current (i.e. not delinquent) at the time of the Coupon Book Request.

y. The Commission requires that our Student Loan Billing Servicer generate an automatic Billing Statement when a Coupon Repayment Borrower becomes delinquent.

3. **Collections**

a. The Commission requires that our Student Loan Billing Servicer's Software contain a fully integrated Collection Module to automatically and manually place and recall accounts to our Internal Collectors based on Commission Collection Parameters.

b. The Commission requires that our Student Loan Billing Servicer's Software provide the Commission staff with the ability to *manually* place and recall Collection Agency

Accounts through your system.

c. The Commission requires that all *manually* placed Collection Agency Accounts be available to our Collection Agencies in less than (24) hours.

d. The Commission requires that our Student Loan Billing Servicer's Software have the ability to *automatically* place and recall all of our Collection Agency Accounts (according to our specific Commission Placement Parameters) through a fully customized Auto Agency Placement Process. The Commission also requires that our Collection Agencies (and our staff) are provided with an "Agency Warning Report" to indicate the accounts that have not had any "activity" for the past (9) and (11) months as a pre-cursor to the 12-month Automatic Account Recall(s).

e. The Commission requires that our Student Loan Billing Servicer's Software have the ability to automatically *calculate* and *display* Collection Agency Fees Due (on-line and in real-time) once an account is placed with a Collection Agency – and not at the time when a Collection Agency Payment is being applied to the borrower's account.

f. The Commission requires that our Student Loan Billing Servicer's Software track all Collection Letters sent via the system, as well as all comments and/or actions taken by our Internal Collection Staff, including: Date, Time, Action Taken, and By Whom.

g. The Commission requires that our Student Loan Billing Servicer's Software provide the ability for Commission staff to create a *Balance Profile Report* for a single borrower to instantly view and/or print the borrower's Principal Balance History as it's reduced due by borrower payments, cancellations, etc.

h. The Commission requires that our Student Loan Billing Servicer's Software provide the ability for Commission staff to create an *Account Profile Report* for a single borrower, on demand. The Account Profile Option should allow the Commission to select, view, and/or print all Transaction History, by Date Range and/or Transaction Type (i.e. Advances, Deferments, Cancellations, Payments, etc.) for a specific borrower.

i. The Commission requires that our Student Loan Billing Servicer's Software provide the ability for Commission staff to create a *Collection Profile Report* for a single borrower on demand. The Collection Profile Option should allow the Commission to select, view, and/or print all Collection Memos by Date Range for a specific borrower.

4.   Standard and Custom Interfaces

    a. The Commission requires that our Student Loan Billing Servicer provide *all* of the following Standard Interfaces.

        1. Award Files for On-Line Entrances & eSig MPNs
        2. Signed Promissory Note Files to Release Disbursements
        3. New Loan & Advance Files
        4. Student Identification Number (SID#) Files
        5. Student / Borrower Email Address Files
        6. General Ledger / Accounting Feed Interface Files
        7. State Tax Offset Files
        8. Delinquent Receivable Payment Files for A/R Systems Updates
        9. Demographic Information Files for Campus Database Updates

    b. For all Interfaces coming *from* the Student Loan Billing Servicer's System (ex: Signed Promissory Note Files, General Ledger/Account Feed Files, Delinquent Receivable Payment Files, Demographic Information Files, etc.), the Commission requires that our Student Loan Billing Servicer provide these required Interface Files in *our* File Layout and Formats due to limited internal IT Staff Resources.

    c. Conversely, all Interfaces coming *from* the Commission (ex: Award Files, New Loan / Advance Files, Registration Files, Graduation File, etc.), must be accepted and processed by our Student Loan Billing Servicer in our *existing* File Layout and Formats (rather than conforming to your specific File Layout and Format Requirements) due to limited internal IT Staff Resources.

5.   Standard and Custom Reports

    a. The Commission requires that our Student Loan Billing Servicer's Software allow staff to produce reports on-demand, by allowing the end user to *create, view,* and *print* reports at any given time. As an example, and assuming that today's date is October 17th, does your system provide the ability to instantly create and print an updated Month-End Management Report, which reflects activity dated October 1st through October 17th.

    b. The Commission requires that our Student Loan Billing Servicer provide *us* with the ability *to retrieve our Monthly Management Reports in the following formats*.

        ▪ Microsoft Excel Format
        ▪ PDF Format
        ▪ Text Format

c. The Commission requires that our Student Loan Billing Servicer provide the *Commission staff* with the ability to retrieve a copy of any Month-End Management Report for *any* month and year that the Commission has been a client.

6.   Credit Bureau Reporting

a. The Commission requires that the Student Loan Billing Servicer report to National Credit Bureaus.

b. The Commission requires that the Student Loan Billing Servicer maintain a month-by-month, 10-Year Perpetual Credit Bureau History on each borrower from the date of first disbursement.

7.   Other Services

a. The Commission requires the Student Loan Billing Servicer have the ability to provide a fully customized, On-Line Entrance Interview and eSignature Promissory Note Solution to our borrowers.

b. The Commission requires online access to a borrower's On-Line Entrance & eSigned Promissory Note by Account Number.

c. The Commission requires online access to a borrower's On-Line Entrance & eSigned Promissory Note by Date Range.

d. The Commission requires the Student Loan Billing Servicer's system have a visible indicator that a Promissory Note was Electronically Signed.

e. The Commission requires that our Student Loan Billing Servicer have the ability to provide a fully automated Electronic Disclosure Process.

f. The Commission requires that our Student Loan Billing Servicer have the ability to provide a fully automated Mailed Exit Interview Solution that monitors all "unsigned" On-Line Exit Interviews from its website and programmatically allows the Student Loan Billing Servicer to print and mail these documents within the required 30-day timeline.

g. The Commission requires that our Student Loan Billing Servicer have the ability to provide a fully automated Skip Tracing Service to locate our borrowers with bad addresses.

h. The Commission requires that our Student Loan Billing Servicer's fully automated Skip Tracing Service create an automatic memo on each Skip Traced Account for auditing purposes.

i. The Commission requires that our Student Loan Billing Servicer have the ability to provide a fully automated Electronic Refund Process for our Student Loans, Current Receivables, Delinquent Receivables, etc.

j. The Commission requires that our Student Loan Billing Servicer have the ability to fully comply with the requirements of Regulation Z as they relate to our "private" (non-Perkins) loans. The solution provided should be web-based and fully automated to present borrowers with the required disclosures and self-certification form.

8. **The Commission requires that our Student Loan Billing Servicer have the ability to provide a complete Delinquent Receivable Management Solution. This process should include any combination of custom letter, phone, and email contacts as well as working closely and interfacing with Commission contracted collection agencies for maximum return.**

9. **The Commission requires that our Student Loan Billing Servicer have the ability to fully comply with the Red Flag Regulation requirements concerning identity theft.**

10. **Integrated Document Writer**

a. The Commission requires that our Student Loan Billing Servicer utilize *Microsoft Word* as it's primary, integrated, Document Writer to allow an automatic mail merge of demographic information and all other types of miscellaneous data into fully customized Commission staff created letters and notices.

b. The Commission requires that our Student Loan Billing Servicer's Document Writer have the ability to accept our *existing* Microsoft Word Document Templates for instant letter creation.

c. The Commission requires that our Student Loan Billing Servicer's Document Writer provide the Commission with the ability to produce a Custom Letter for an *individual borrower* and/or *merge our entire Student Loan Portfolio*, based on our requested criteria and unique letter generation needs.

d. The Commission requires that our Student Loan Billing Servicer's Document Writer have the ability for on-demand, automatic generation and printing of *Full Exit Interview Materials* (i.e. Rights and Responsibilities, Truth In Lending, Amortization Schedule,

Reference Page, etc.) by the Commission.

e. The Commission requires that our Student Loan Billing Servicer's Document Writer create an *Automatic Memo* on each account for tracking and auditing purposes. This Automatic Memo should contain the Date, Time, Operator's Initials, and Document Name, for Auditing Purposes.

f. The Commission requires that our Student Loan Billing Servicer's Document Writer provide the ability to automatically assess a *Commission-Specific Letter Fee* for certain Commission Delinquency Letters. This Automatic Letter Fee should automatically appear in the Letter Fee Field on your Primary Window.

g. The Commission requires that our Student Loan Billing Servicer's Document Writer provide the ability to automatically assess a *Commission-Specific Review Date* for certain Commission Delinquency Letters for Internal Collector Follow-Up.

11. Borrower Interface Functionality

a. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to update their Demographic Information on-line.

b. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to make instant ACH / Direct Debit and/or Credit Card Payments.

c. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to sign-up for Temporary or Permanent ACH / Direct Debit Payments.

d. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to review their Direct Payment Transaction History.

e. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to update their Banking Information.

f. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to sign-up for eBills, instead of receiving paper Billing Statements.

g. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to instantly retrieve a copy of an Electronic Billing Statement for *every* month and year that the borrower has been in Repayment and the Commission has been a client. Please note: This functionality should be made available to all Commission Borrowers and not simply those that have signed up to receive Electronic Billing Statements.

h. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to instantly access and view Electronic Copies of every 1098-E Tax Form for *every* year that the Commission has been a client.

i. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to access, complete, and review, fully customized On-Line Entrance Interviews for all Fund and Loan Types.

j. The Commission requires that our Student Loan Billing Servicer's Borrower Website store all completed On-Line Entrance Interviews for instant borrower access.

k. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to access, complete, and review, fully customized Electronic Promissory Notes for all Fund and Loan Types.

l. The Commission requires that our Student Loan Billing Servicer's Borrower Website store all completed Electronic Promissory Notes for instant borrower access.

m. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to access and review fully customized, Electronic Disclosure Statements for all Fund and Loan Types.

12. **Client Website Functionality**

a. The Commission requires that our Student Loan Billing Servicer's Client Website allow Commission staff to view Borrower Website Information in the exact format that our borrowers view it.

b. The Commission requires that our Student Loan Billing Servicer's Borrower Website provide the ability for our borrowers to review their Direct Payment Transaction History.

c. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to retrieve a copy of an Electronic Billing Statement for *every* month and year that the borrower has been in Repayment and the Commission has been a client. Please note: This functionality should be made available to for all Commission Borrowers and not simply those that have signed up to receive Electronic Billing Statements.

d. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to review a specific borrower's Current Account Balance Information.

e. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to view a specific Electronic Copy of any 1098-E Tax Form for *every* year that the Commission has been a client.

f. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to review all "Signed, Unsigned, and/or Cancelled" On-Line Entrance Interviews by "Account Number" and by "Date Range".

g. The Commission requires that our Student Loan Billing Servicer's Client Website allow this information to be downloaded and exported into a Microsoft Excel File.

h. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to review all "Signed, Unsigned, and/or Cancelled" Electronic Promissory Notes by "Account Number" and by "Date Range".

i. The Commission requires that our Student Loan Billing Servicer's Client Website allow this information to be downloaded and exported into a Microsoft Excel File.

j. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to view all Electronic Disclosure Statements by "Account Number".

k. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to instantly access all scanned documents, such as Checks, Remittance Statements, Entitlement Forms, ACH Forms, Miscellaneous Borrower Correspondence, etc.

l. The Commission requires that our Student Loan Billing Servicer's Client Website

provide the ability for Commission staff to retrieve *any* Monthly Management Report from *every* month and year, since the Commission has been a client.

m. The Commission requires that our Student Loan Billing Servicer's Client Website provide the ability for Commission staff to retrieve *any* Month-End Management Report from *every* month and year, since the Commission has been a client, in both *Microsoft Excel* and *PDF Formats*.

13. Collection Agency Website Functionality

a. The Commission requires that our Student Loan Billing Servicer's Collection Agency Website post all Commission-Placed Collection Accounts and Related Information within (24) hours or less.

b. The Commission requires that our Student Loan Billing Servicer's Collection Agency Website allow our contracted Collection Agencies to view all Loan Master File Information per Borrower.

c. The Commission requires that our Student Loan Billing Servicer's Collection Agency Website allow our contracted Collection Agencies to view all Name and Address History per Borrower.

d. The Commission requires that our Student Loan Billing Servicer's Collection Agency Website allow our contracted Collection Agencies to view all Reference Information per Borrower.

e. The Commission requires that our Student Loan Billing Servicer's Collection Agency Website allow our contracted Collection Agencies to view all Transaction History per Borrower.

f. The Commission requires that our Student Loan Billing Servicer's Collection Agency Website allow our contracted Collection Agencies to view all Memos / Comments per Borrower.