

Author Full Name : Anonymous**Received Date :** 06/13/2024 02:11 PM**Comments Received :**

As Section VII is currently structured, CMS demonstrates they are more interested in participant numbers. CMS should consider increasing oversight of program viability, and the Unsettled Balances section should be enhanced accordingly.

For example, adding growth rates and dollar growth amounts in the Unsettled Balances would be good additions. Metrics involving numbers of people with higher loan averages (splicing the population) would also provide greater insight into program viability. Nonpayment and late payment instances should be tracked. Overall, viewing this program's reporting from a lens of loan management should help to build a more robust set of metrics.