



ASA / NCCAOM Town Hall #2 Q&A

April 14, 2020, 5pm PDT/8pm EDT

[Video Recording](#)

[PowerPoint Slides](#)

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Students and Schools

Questions Directed to ACAOM

Question: Can you give an example of some of the creative, innovative, and ground-breaking strategies you have identified to offer acupuncture education?

Answered on 04/16/20: This question appears to be related to ACAOM's 2025 Vision Statement - please see <http://acaom.org/2025-vision-statement/>.

Question: In order not to compromise the quality of our education which is highly dependent on sound clinical education, are the emergency measures being introduced for new practitioners contingent on further clinical experience when the pandemic eases?

Answered on 4/16/20: The emergency measures are just that – emergency measures. ACAOM will continue to monitor the evolving situation and take timely and appropriate action within our authority.

Question: Could senior year primary treaters in clinic shadow a licensed acupuncturist and have a graduation guideline criterion in order to fulfill the board licensing requirements? I know my school would provide an assessment book that was basically a checklist of specific tasks needed to be completed as extra learning and a part of the clinic curriculum.

Answered on 4/16/20: Please seek guidance from your institution.

Question: For those of us that do not live in CA, when and who will be responsible for deciding the clinical hours that will be online? This affects graduates in August and December!

Answered on 4/16/20: Please seek guidance from your institution.

Question: some students do not want to participate in online clinical shifts. If the stay-at-home mandates extend for several semesters and it affects graduation times for students that defer clinic at this time to extend beyond the 1.5 programmatic completion time requirements, will there be flexibility from ACAOM for students affected by this crisis as it relates to this requirement?

Answered on 4/16/20: ACAOM will continue to monitor the evolving situation and take timely and appropriate action within our authority.

Question: Would it be helpful for senior Acupuncturists to make their offices available for student clinic observation so that students have more opportunities to complete their clinic requirements? The senior Acupuncturists could receive CEU credits as well.

Answered on 4/16/20: Please contact ACAOM accredited institutions in your area to discuss this option.

Question: Could you explain the 50 hours of clinic observation. Can they be done thru distance learning like online case review?

Answered on 4/16/20: Please review ACAOM's 2 April update at <http://acaom.org/2020/04/03/commission-updates-regarding-covid-19-2-apr-2020/>.

Question: As a TCM school administrator, I am most concerned about the students graduating this Summer. We need to be thinking of them as they are just about to finish up and the DE clinical hours need to be expanded for this group.

Answered on 4/16/20: ACAOM will continue to monitor the evolving situation and take timely and appropriate action within our authority.

Question: Some schools are not allowing students to work as interns inside other clinics. Can a student receive clinical hours by working in an operating/up and running acupuncture clinic during this pandemic?

Answered on 4/16/20: Please seek guidance from your institution.

Question: In tonight's Town Hall meeting ACAOM mentioned that they were allowing 50 hours or one third of the required clinical hours to be done online. If a program has many more clinical hours than that requirement, would we be able to do one third of them online, provided the students have already met the 150-hour requirement?

Answered on 4/16/20: ACAOM indicated that 50 hours of clinical observation may be completed using DE. For details please review ACAOM's 2 April update at <http://acaom.org/2020/04/03/commission-updates-regarding-covid-19-2-apr-2020/>.

Question: When will the ACAOM recognize the constraint of the student and allow the appropriate variance to online clinical course work so students can move forward in their programs? The current 70-hour limit is prohibitively constraining for prospective 2020 graduates.

Answered on 4/16/20: ACAOM will continue to monitor the evolving situation and take timely and appropriate action within our authority.

Question: I am a current student who was to head into my senior year as an intern. How likely will it be that students in similar situation will be able to graduate on time in the midst of the current crisis and what they are projecting will most likely impact the fall semester as well?

Answered on 4/16/20: Please seek guidance from your institution.

Question: Does "higher education" means the doctoral program?

Answered on 4/16/20: ACAOM accredits programs at the Masters and Doctoral level.

Question: Before this whole thing started my school was discussing the possibility of a distance training masters in Chinese Herbology. Some of our faculty is worried about the standardization of diagnostic techniques. Is there any guidance or policy regarding this?

Answered on 4/16/20: Please refer to [ACAOM's Policy on Distance Education](#).

Question: Would you be able to comment on the topic of doctoral degree designation confusion (DAOM, DACM, etc.)?

Answered on 4/16/20: Please refer to [ACAOM's Program Naming Policy](#).

Questions Directed to CCAOM

Question: Why not clean needle courses on-line?

Answered on 4/16/20: In general, the Clean Needle Technique (CNT) course includes a significant practical portion that is important for assessing practitioner skill. This presents a challenge to develop something online that meets the same standard as the in-person course. The CNT committee is exploring all possibilities right now, especially in the midst of the pandemic.

Question: Are CNT guidelines for best acupuncture practices being updated/modified to address infection control for COVID-19?

Answered on 4/16/20: CCAOM has posted CNT information for COVID-19 on our website under COVID Resources. If you have specific questions, please send them to Roberta Herman (rherman@ccaom.org) and she will get them to the CNT Committee.

Question: In order not to compromise the quality of our education which is highly dependent on sound clinical education, are the emergency measures being introduced for new practitioners contingent on further clinical experience when the pandemic eases?

Answered on 4/16/20: This is a great question. CCAOM and ACAOM are committed to maintaining high standards for clinical training, especially during the pandemic. CCAOM is working closely with ACAOM on the educational ramifications of the pandemic on clinical education. CCAOM has recently proposed parameters for distance education for clinical training to ACAOM for the current situation that not only uphold current clinical educational competencies, but also potentially add to the clinical experience. We are seeing the benefits educationally of distance education for clinical observation and the benefits of introducing telemedicine. Many schools are planning to offer interns the opportunity to return for additional training after graduation, to create further opportunities for clinical training. As a Council, we are looking at how much clinical training can be educationally effective, while meeting the current ACAOM standards and competencies.

Profession Related Questions

Question: Will there be more of a discussion of what the NCCAOM will do to make acupuncturist considered "essential health care practitioners/ Or is he just going to talk about educational issues?

Answered on 4/16/20 - NCCAOM: The definition of essential workers is defined by states as each state has designations for essential workers. NCCAOM does not have any influence on whether Acupuncturists are deemed essential in each state. For additional information visit the ASA website for [ASA's guidelines can be found here](#).

Question: If I tested negative for COVID 19 and positive for the immunity antibodies am I safe to return to work?

Answered on 4/18/20 - ASA: ASA is watching for updates from OSHA and CDC regarding serum antibody testing. While serology testing is available at some locations, the accuracy is

uncertain at this time. At this time, the ASA recommends that all practitioners follow safety protocols with PPE for in-person treatments. [Please review the ASA Essentials letter.](#)

Question: eLotus is offering a webinar on the treatment protocol for COVID19 so why are we not allowed to tell our patients we have formulas and Tx protocol for it?

Answered on 4/18/20 - ASA: The eLotus class is a report of the protocols used in China, where practitioners are allowed to speak in Western medical terminology (and where the citizens speak in Chinese medical terminology. In the United States, acupuncture laws vary from state to state. Diagnosis by acupuncturists in these statutes indicates that we are limited to “acupuncture and Oriental/East Asian medicine diagnoses.” As COVID-19 is not a traditional acupuncture diagnosis, acupuncturists are not allowed to “treat the diagnosis of COVID-19.” In a similar fashion, acupuncturists do not diagnose “the flu.” Acupuncturists are allowed to treat symptoms, and the collection of symptoms, as we construct our differential diagnosis based on the theories of acupuncture & East Asian medicine.

Question: Is there any discussion about public relations with countering some anti-Chinese sentiment that has been expressed (e.g. the Chinese/Wuhan virus) bringing up bigoted attacks against Asian people, and potentially anyone who practices Chinese medicine?

Answered on 4/18/20 - ASA: In February, the ASA COVID-19 Information Sheet was shared, in which, we listed the Myths and Misconceptions of COVID-19, which does address this concern of anti-Chinese sentiment. While we do not have an official public campaign, we are encouraging everyone to be aware and to ensure proper terminology is used at all times.

Question: I am a student; how can I connect with the ASA student committee?

Answered on 4/18/20 - ASA: You may already be an ASA Student member if you are a student member of your state acupuncture association. A few schools have automatic student membership enrollment to their state acupuncture associations. If your school does not provide that you can be a [student associate](#) to the ASA on our website. You can also contact our Student Committee Chair, Alex Russell through her email: Students@ASAcu.org.

Question: Could you address malpractice insurance and liability issues/waivers specific to COVID-19?

Answered on 4/18/20 - ASA: For specific information, please contact your malpractice carrier. In general, you do not need an extra liability waiver for your malpractice insurance, assuming the practitioner is not negligent. Marilyn Allen of AAC addressed in the [CSOMA/ASA/NCCAOM/LhasaOMS Town Hall](#). For those who have CM&F insurance, their carrier is [MedPro group](#), please view their FAQ#1 for more specifics. Again, please contact your malpractice insurance for more information. ASA is also watching for any government waivers/malpractice immunity.

Question: Will NCCAOM do some research for the COVID 19? Such as how can Chinese medicine cures COVID 19? Do you think COVID 19 is a type of Wen Bing?

Answered on 4/18/20 - ASA: The ASA recommends that acupuncturists treating patients with COVID-19 to participate in the [NCNM/Helfgott Traditional, Complementary and Integrative Health and Medicine COVID-19 Support Registry](#). We are on the lookout for studies coming out of

China. ASA reminds acupuncturists to use our differential diagnoses in the treatment of patients with the symptoms of COVID-19. ASA supports all the schools of acupuncture/East Asian Medicine; therefore, Wen Bing theory, as well as others, can be applied to understanding COVID-19.

NCCAOM Certification and Recertification

Note: The NCCAOM application for certification and recertification must be submitted through your NCCAOM online portal. All Diplomates are required to report their continuing education for recertification electronically in their NCCAOM online portal. Continuing education reporting instructions are available [here](#).

Certification

Question: As a student, I do not fully understand what you mean when you are talking about "waivers." Can you break down what that means?

Answered on 4/20/20: The NCCAOM has made multiple temporary emergency changes to the examination process due to the closing of the Pearson VUE testing centers and the cancellation of the in-person Council of Colleges of Acupuncture and Oriental Medicine (CCAOM) Clean Needle Technique (CNT) program courses. If you are a student due to graduate in 2020 the NCCAOM is working with your school to ensure you are able to begin the testing process. The student will need to:

1. Contact the school to confirm your anticipated graduation date for 2020.
2. Once the school submits your graduation class information to NCCAOM, you will be contacted by NCCAOM and guided through the application process.
3. Request your CNT course verification from CCAOM once your application for certification with NCCAOM has been completed.
 - a. Applicants who have not previously completed the in-person CCAOM CNT course must register for a future CCAOM CNT program course and submit the CCAOM confirmation registration letter to the NCCAOM at covid19alerts@thenccaom.org.

Achieving final NCCAOM certification requires (1) successfully passing all required NCCAOM certification exams, (2) receipt of the CCAOM CNT certificate of completion directly from the CCAOM to NCCAOM, and (3) receipt of the official final graduation transcript from the school.

Question: As the majority of my graduating class (set to graduate next month) have been affected by the CNT cancellations in March, how possible is it to change the requirement to complete CNT prior to sitting for the boards? Can the possibility to take CNT after boards (before licensure) be taken into consideration?

Answered on 4/20/20: Most graduating students should not be affected by the CCAOM CNT closures as it is our understanding that students are required to complete the CNT prior to beginning clinical studies. However, students graduating in 2020, who may not yet have completed the in-person CCAOM CNT course, must register for a future CCAOM CNT course and submit the CCAOM confirmation registration letter to the NCCAOM at

covid19alerts@thenccaom.org at the time of application; 60 days prior to the confirmed anticipated graduation date provided to the NCCAOM by your school.

Question: Does the CNT have to be received before a candidate can TEST or before they can get certified?

Answered on 4/20/20: If you have completed the CCAOM in-person CNT course then you must have CCAOM submit it to NCCAOM at the time of application. A temporary exception has been put in place that If you have not completed the CNT in-person course you must submit to covid19alerts@thenccaom.org a copy of the CCAOM CNT registration confirmation letter to document that you are registered for a future CCAOM CNT course. The in-person CCAOM CNT certificate of completion is required to achieve final certification as is the final graduation transcript from the school.

Question: Will the time to complete exams post-graduation be extended by the amount of time exams have or may not be available due to COVID closures?

Answered on 4/20/20: **Any** individual who applies for NCCAOM certification has a valid application on file for four years. The applicant may complete the certification requirements any time during the four-year period. If the individual is not certified within the valid four-year application period they must reapply to continue the certification process.

Question: Since we are going back to the adaptive exams will the test cover the new material for 2020 changes?

Answered on 4/20/20: All NCCAOM certification examinations since January 2020 have been based on the 2017 Job Analysis implemented in the 2020 exam content outlines.

Question: Will the NCCAOM be continuing the previous criteria regarding didactic and clinical requirements for students applying for pre-graduation status testing?

Answered on 4/20/20: The specific aspects of the education you acquire to earn a degree are set by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM). The NCCAOM education eligibility requirements for applicants educated in the United States are that the applicant/candidate must have graduated from an ACAOM accredited school and must have their graduation transcript submitted to the NCCAOM directly from their school. Your school is responsible for adhering to the ACAOM standards to ensure their education programs maintain accreditation.

Question: Will the ability to sit for exams prior to graduation continue to be an option from here on out, as it was in the past? Or, will it go away after the crisis passes?

Answered on 4/20/20: No, Application before graduation is a temporary exception due to the unusual circumstances created by the COVID-19 pandemic.

Question: Could CALE or NCCAOM make exceptions for students who have completed all didactic classwork, but still need to complete clinic hours to register and start sitting for portions of the exam once it is deemed safe to sit for exams again?

Answered on 4/20/20: The NCCAOM has made multiple temporary emergency changes to the examination process due to the closing of the Pearson VUE testing centers and the cancellation

of the in-person Council of Colleges of Acupuncture and Oriental Medicine (CCAOM) Clean Needle Technique (CNT) program courses. If you are a student **due to graduate in 2020** the NCCAOM is working with your school to ensure you are able to begin the testing process. Please contact your school.

Question: The website says we cannot start our application until 60 days prior to our graduation date, is that still the rule?

Answered on 4/20/20: Yes, if you are graduating in 2020 your school has been notified that they can send NCCAOM a list of graduates with the students anticipated graduation date. The NCCAOM will then reach out to the student 60 days prior to the anticipated graduation date to notify the student to submit their NCCAOM application for certification and to notify CCAOM to submit their CNT certificate of completion. A temporary exception has been put in place that if you have not completed the CNT in-person course you must submit to covid19alerts@thenccaom.org a copy of the CCAOM CNT registration confirmation letter to document that you are registered for a future CCAOM CNT course. Once the application is received the school will automatically be notified to upload your preliminary transcript and graduation confirmation date form. When all documents are received the NCCAOM will notify you that your authorization to test letter is available on your NCCAOM online portal. The whole process should take no more than one week from the time you submit the application.

Question: What is the difference between the linear and adaptive exam administration?

Answered on 4/20/2020: NCCAOM examination modules are administered using the adaptive computer testing format, which has the major benefit of offering the exams year-round at the candidate's convenience. The adaptive exams are offered in English and consists of 100 multiple choice questions. These Items/questions appear one at a time on the computer screen and may include visual images. Once the candidate selects their answer, they can proceed to the next question. It is important to note that during adaptive testing, candidates are not able to go back to review or change their answers once they have moved to the next question. Once the exam is complete, all candidates will receive a preliminary status of pass or fail before leaving the test center.

The linear examination format is offered after the NCCAOM has completed a Job Analysis, which is conducted every five years. The Job Analysis is the major way for NCCAOM to update its content outline(s) to make sure that the items for its four exam modules are current and valid. To define this in a simple manner; a NCCAOM Job Task Analysis study which is a nationwide study, links Oriental medicine jobs/tasks, qualification(s), education, knowledge, years' experience, experience, etc. to the content outline. The exam administration period and number of items for the linear is dependent upon changes to the content outline generated from the Job Analysis and NCCAOM administration. Similarities to the adaptive is that the question/item will appear one at a time on the computer screen and may include visual images. But during a linear testing administration, once the candidate completes their exam, they can go back and review/change their response to items if allowed within the candidate's testing timeframe. Once the exam is complete, a candidate must wait 45 business days from the administration of the last exam delivery date to receive their official score by USPS mail. Candidates will not receive a preliminary status of pass or fail before leaving the test center.

The Chinese and Korean foreign language exams are offered in linear format. However, due to the inadequate number of testers the foreign language exams have been canceled for 2020. Foreign language 2021 administration dates have not yet been determined.

Question: My school sent in our information for the eligible candidate qualifying three weeks ago. How long will it take before the eligibility email is sent out to us to sign-up for the exam?

Answered on 4/20/20: Students graduating in 2020 whose names have been submitted to the NCCAOM will be contacted 60 days prior to their confirmed anticipated graduation date to inform that they should complete and submit the NCCAOM application for certification.

Question: Some classmates mentioned that Dongguk, Los Angeles is still offering CNT course online to students. Is that still a credible course?

Answered on 4/20/20: You will need to check with Dongguk, LA as to the purpose of their course. The NCCAOM requires the in-person CCAOM CNT course for authorization to test and to achieve final certification. The CCAOM *CNT Review Course: Acupuncture Safety* is the only online CNT course currently approved by the NCCAOM PDA department.

Question: Will the California Licensed Acupuncturists Route for Certification in Oriental Medicine deadline be extended beyond 12/31/2020?

Answered on 4/20/20: No, The crosswalk performed by California was based on the NCCAOM 2013 Job Analysis. The current NCCAOM 2020 exams are based on the 2017 Job Analysis.

Recertification

Question: While we are waiting, will you be extending the time period for lapsed membership amnesty?

Answered on 4/20/20: A former Diplomate in lapsed status where their expiration due date was between March 31 and September 30 may submit their recertification application and work with a NCCAOM Customer Relations Team member over a 90-day grace period to earn all PDAs required for recertification (varies depending on the number of years lapsed). No additional late fees will be applied. If the country stays shut down past June 15th the NCCAOM will relook at the September 30 expiration as an end date. All Diplomates are required to report their continuing education to their NCCAOM online portal. Continuing education reporting instructions are available [here](#).

Question: What is the situation concerning CEU requirements for practicing L.Ac.s? Will the % of distance learning be higher than in previous years?

Answered on 4/20/20: The NCCAOM has never limited the percent of distance courses allowed for recertification. Diplomates may complete all coursework requirements for PDA/CEU on-line.

Question: Can we get our CPR certification online during the pandemic?

Answered on 4/20/20: Diplomates have always been able to complete an online CPR course for recertification.

Question: Will there be an extension of June 2021 deadline for lapsed NCCAOM diplomats to Reinstate without having to take the exam?

Answered on 4/20/20: The NCCAOM has reached out to NCCA to request an extension of the current Time-limited Reinstatement Route. We do not yet have a response. Please visit the [Reinstatement page on the NCCAOM website](#) where we will place any notice of change, if approved.

Other Topics

Question: When will I receive my PDA points from attending the NCCAOM/ASA Town Hall?

Answered on 4/07/20: Certificates of completion for Town Hall meeting attendance will be emailed within two weeks of the meeting date.

Question: What is the status of licensing in California? Will it be under NCCAOM or remain licensed with a set of state regulations in California, exclusively?

Answered on 4/20/20: The NCCAOM continues to engage with the California Acupuncture Board answering questions and providing information as needed. The California legislature must have a champion to present a bill to vote in a change to licensing for California acupuncturists to require the NCCAOM exams. The NCCAOM has no control of the licensure process in California as requiring the NCCAOM examinations in CA is under the state jurisdiction of the California Acupuncture Board. We encourage you to contact them for further information.

Question: How does a school get permission to change a CEU program to an online program?

Answered on 4/20/2020: The PDA staff have been working with PDA Providers to convert their live, face-to-face course to either an online or a live streaming webinar. Each course type requires different continuing education standards and each Provider has different circumstances. Therefore, the PDA staff are working with each Provider on a one-to-one basis. Schools are encouraged to contact the PDA Department at pda@thenccaom.org if they wish to adjust their approved course to an online program.

Advocacy / CARES Act

Links to Business Benefits

Question: Would you provide the resource or direction where we can apply for the business benefit during this time?

Answered on 4/07/20 – M. Giammarco, MPP: Find more information about the Paycheck Protection Program here: <https://www.sba.gov/document/sba-form--paycheck-protection-program-borrower-application-form>. Find more information about the Economic Injury Disaster Loan program here: <https://covid19relief.sba.gov/#/>.

Information can also be found on the NCCAOM website COVID-19 website page under Helpful Resources: [Coronavirus \(COVID-19\): Small Business Guidance & Loan Resources](#) and [NCCAOM CARES ACT Summary \(Economic Stimulus Package Becomes Law\)](#)

Question: Will there be any discussion as to how the NCCAOM is going to help practitioners obtain SBA disaster relief? That is really what practitioners want to know.

Answered on 4/16/20: The NCCAOM created a COVID-19 Resource Page that provides guidance on applying for SBA loans and other unemployment resources. You are also welcome to contact our team for more information on any of these small-business relief options: advocacy@thenccaom.org.

Question: Do you know if anyone has actually able to get an SBA loan? I have not been able to talk to anyone who has received a loan.

Answered on 4/16/20 – M. Giammarco, MPP: The SBA's PPP and EIDL are in high demand and the response time for both has increased. Both loans are still available, just expect longer wait times for both. The SBA did recently announce that it is reducing its grant portion of the EIDL to \$1k/employee due the extraordinary demand. Congress is currently working on legislation to add more funds to both the PPP and EIDL.

Student Loan Information

Question: Can you pay your "employee's" student loan if you are a sole prop paying yourself with a w2?

Answered on 4/16/20 – M. Giammarco, MPP: We have not seen any literature prohibiting such payments but check with your accountant to confirm.

Question: Is the \$5,250 payable to student loans without being counted as income an annual number or just until September 2020?

Answered on 4/13/20 – M. Giammarco, MPP: The CARES Act stipulates that the \$5250 employer payment amount will not be counted as income through the 2020 year.

Question: Just to clarify, borrower's student loans are on automatic suspension. The borrower does not need to do anything except for private loans. Then they should contact that lender to request the forbearance. If they have questions they should contact their loan servicer.

Answered on 4/16/20 – M. Giammarco, MPP: Yes--that is correct. Federally back student loans repayments and associated interest are suspended until through September 30, 2020. This only applies to federally back loans. If your loan is not federally back, we recommend that you contact your lender for information on repayment modifications. Note that private lenders are not obligated to waive, suspend, or modify repayment schedules.

Question: As far as the student loans go, do we have to physically CALL and tell them to not have interest accrued or is this just across the board on every person with a federal loan?

Answered on 4/13/20 – M. Giammarco, MPP: If you have a federally backed loan, you will not need to take any action to stop interest from accruing. It is likely that you will receive a letter from the U.S. Department of Education stating that interest accrual has stopped until September 30,

2020. If you have a loan that is state-based or privately backed, we recommend that you call your lender to confirm determine if your repayment requirements are waived due to COVID-19.

Question: They say automatic payments to loans are suspended? If I have automatic payments, I have to check to make sure it is continuing?

Answered on 4/13/20 – M. Giammarco, MPP: If you have a federally back loan, the U.S. Department of Education will stop automatic deductions from your account through September 30, 2020. If your loan is state based of back from a private lender, we recommend that you contact your lender to see if any loan repayment modifications are in place. If you want to continue to pay your federally back loan, you will need to contact your lender to opt back in to make automatic payments.

Question: What about if you refinanced your student loan and now it is considered a "Private loan", not federal.

Answered on 4/07/20 – M. Giammarco, MPP: The CARES Act and other student-loan modifications from the Department of Education only apply to federally backed loans, but many private lenders are providing adjustments. Contact your private lender to see repayment modifications or suspensions are in place.

Question: I called New Mexico Student Loans and they informed me that I could do a verbal forbearance, but interest would still be accruing. Is that right, or do they need to get caught up?

Answered on 4/07/20 – M. Giammarco, MPP: The CARES Act suspended federally backed student loan repayments and reduced the loan interest rate to 0% through September 30. This only applies to federally backed loans; state-based loans or private loans are not subject to the same terms but may also provide modification terms during the COVID-19 emergency. Check with your lender and your state education department for more information on any such modifications.

Question: Do these payment deferrals still count towards our 120 payments for public service loan forgiveness?

Answered on 4/07/20 – M. Giammarco, MPP: Yes

Question: Student Loans - Individuals on an Income-based repayment plan, my understanding is that if the loan is deferred it may affect the length of the repayment period, and when the maximum repayment time ends. Is that correct?

Answered on 4/07/20 – M. Giammarco, MPP: This will vary by lender. Check with your lender to confirm.