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Agenda

- A recent modification
- New Award Year Setup for Award Year 2015 2016
- COD edit modifications
- Direct Loan Rebuild File modifications
- New Subsidized Usage Limit Applies (SULA) screens
 SULA Inquiry/SULA Calculator
- New XML Schema 4.0b For Award Year 2015 2016 Data
 - ✓New tags
 - ✓ New system-generated response
- New Student Eligibility Tag
 - ✓ New codes



Agenda - Continued

- COD Modifications to comply with changes to the Direct PLUS Loan Program
 - ✓ Changes to adverse credit criteria
 - ✓ Credit check "window of validity" extended from 90-days to 180-days
 - ✓ New Direct PLUS Loan Counseling Requirement
- Other changes to COD
 - ✓ Credit Status Response request screen
 - ✓ Subsidized Usage Inquiry screen
 - √Subsidized Usage Calculator



A Recent Modification...

Enhanced Direct PLUS Loan Parent Borrower Validation



Enhanced Direct PLUS Loan Parent borrower validation modifications with COD Release 13.2 on December 12th, 2014

- ONLY on Parent Direct PLUS Loans with a credit check result of "Pending" and an identifier mismatch between COD and the credit bureau
 - ✓ If the Parent SSN/DOB submitted on the LOR (loan origination record) differs from the Parent SSN/DOB on the student's CPS data the credit search result will be returned "Pending" and COD will reject the LOR with a new edit code #216

Implementation of the COD Release for Award Year 2015 – 2016 Will Occur on March 29, 2015



New Award Year Setup for 2015 – 2016 will include the "normal" changes that occur from one award year to the next...

- The award year designator will change from "15" to "16"
 - √ System-generated files
 - ✓ Master Promissory Note IDs
 - ✓ Agreement To Serve IDs
 - ✓ Direct Loan award IDs
- Common Record Responses (CRRS) will be returned in the schema of submission
- COD "award year specific" options will increment one year



The Funding Method remains "Advance Funded"

- Direct Loan schools NOT on heightened Cash Management receive an initial CFL (Current Funding Level)
- Pell Grant and TEACH Grant schools remain "records first"
 - ✓ Must submit, and COD must accept, actual disbursement data to "establish" and/or increase your Current Funding Level (CFL)

Advance Funded Direct Loan schools with a history of "early" disbursement activity, will receive an initial Current Funding Level (CFL) shortly after implementation

- Second generation of CFLs in June for remaining schools
- Third generation of CFLs in November
 - ✓Increases to CFL can be generated by reporting (and having) accepted) actual disbursement records
- Internal Controls Division (ICD) staff will monitor CFLs
 - ✓ ICD will "bump" CFL if necessary



COD Edit Modifications



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COD Reject Edit Code #050

- A change to the Financial Award Begin Date and/or Financial Award End Date that results in a disbursement (actual or anticipated), greater than \$0, falling more than 180 days after the Financial Award End Date or more than 10 days before the Financial Award Begin Date
 - ✓ The disbursement date is 180 days after the Financial Award End Date
 - ✓ The disbursement date is 10 days prior to the Financial Award Begin Date

NOTE: Will not be triggered if the disbursement amount is equal to \$0



COD modified Edit #050 to trigger at the Award Level on \$0 disbursements

- No modification to COD Edit #050 validation rules at the disbursement level
- COD Edit #050 will trigger at the award level
 - ✓ On origination if the disbursement falls more than 10 days before, or more than 180 days after, the Financial Award Begin/ End Date
 - ✓On maintenance if a change to the Financial Award Begin/End Date results in the disbursement date falling more than 10 days before the Financial Award Begin Date or more than 180 days after the Financial Award End Date
- · Will not trigger on an inactivated (\$0) disbursement



COD Reject Edit Code #205

 The Payment Period Start Date for the disbursement is not contained within the Financial Award Begin and End **Dates**

Note: Will not be triggered if the disbursement amount is \$0



COD will modify Edit #205 validation of Payment Period Start Date on maintenance submissions

- Edit #205 will be bypassed at the disbursement level...
 - √ When the disbursement = \$0 and the disbursement date is outside the Loan Period
 - ✓ Edit #205 will NOT be bypassed when the disbursement is not \$0 or increased from \$0 and the PPSD falls outside the Loan Period
- Edit #205 will be bypassed at the award level...
 - ✓ Change to the Financial Award Begin/End Date and the PPSD falls outside the Loan Period when a \$0 disbursement is outside the Loan Period
- Edit #205 will not be changed on Origination submissions



COD Reject Edit Code #996

- The content submitted did not conform to valid values according to COD Business Rules
 - √ The content has not been loaded to COD.
 - ✓ Edit 996 will not be returned on PLUS & GRAD PLUS disbursements if incorrect origination fees are submitted on the disbursement

The COD Edit #996 validation of Financial Award Begin/End Date will be modified for Direct Loan maintenance records for all Award Years

- COD will bypass Edit #996 on Financial Award Begin Date when it's changed to fall after the valid begin date range
- COD will bypass Edit #996 on Financial Award End Date when it's changed fall before the valid end date range
- The existing functionality of Edit #996 shall not change
- There will be no changes to the Academic Begin/End Date validation



Direct Loan Rebuild File



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COD will update the Direct Loan Rebuild File

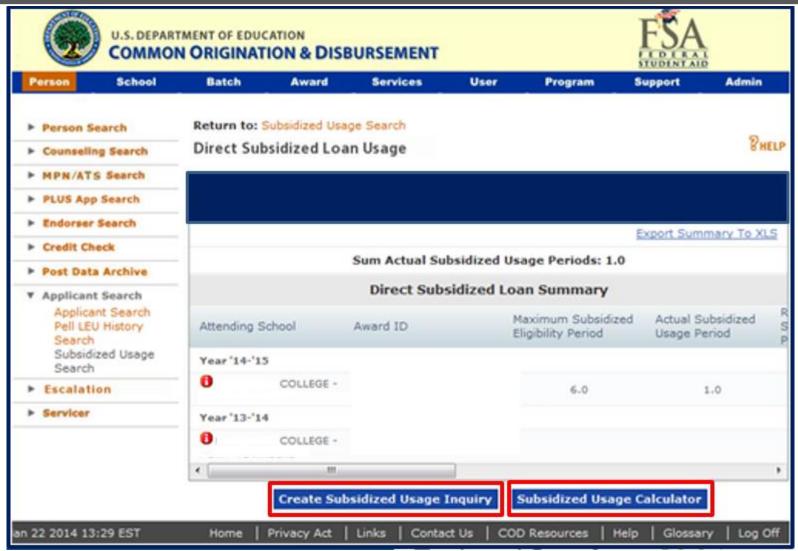
- Anticipated disbursements will be removed from the Origination record and moved to the Disbursement record
 - ✓ The current Disbursement Release Indicator field will indicate actual or anticipated disbursement data
- Subsidized Usage Limit Applies (SULA) data will be added to the Origination record including...
 - ✓ Payment Period Start Date
 - ✓ Program CIP Code
 - ✓ Enrollment Status

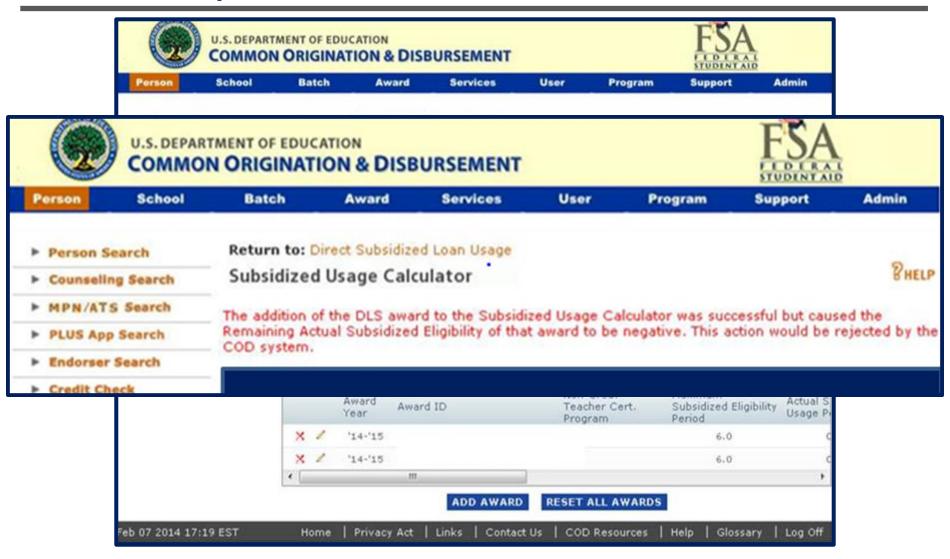


SULA Inquiry/SULA Calculator Screen



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XML Schema Version 4.0b



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Upon implementation of COD Release 14.0 on March 29, 2015...

- ALL award year 2015 2016 Common Record documents must be sent using XML Schema Version 4.0b
 - ✓ All award year 2015 2016 Common Record responses will be sent using XML Schema Version 4.0b
- System-generated, and Web Activity, responses for ALL award years will be sent by COD using XML Schema Version 4.0b
- 100% XML Schema Validation will remain in effect



COD Common Record XML Schema Version 4.0b incorporates several COD system changes of significance

- New Student Eligibility tag replaces the Ability To Benefit tag
 - ✓ New codes and valid values
- New tags and valid values to support new Direct PLUS Loan counseling requirements
 - ✓ New Credit Status Report
- Electronic Announcement dated November 21, 2014 has all the details



COD will require identification of your *reporting*Software Provider and Software Version

- Existing tags <SoftwareProvider> and <SoftwareVersion> now Mandatory
 - ✓ Document will reject with edit code #218 if not submitted
- New <OtherSoftwareProvider> & <OtherSoftwareVersion> tags will be stored by COD if submitted but not edited
 - ✓ Document will *not* reject if not submitted
- For example...a school may process Direct Loan data via a "home-grown" data system but transmit the data to COD via EdExpress software



New Student Eligibility Tag



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COD includes a new tag name and valid values for Ability To Benefit

- <AbilityToBenefit> re-named <StudentEligibilityCode>
- Three new Student Eligibility codes
 - √ 08 State Authorized High School Equivalent Certificate
 - √09 Academic Transcript of 2-yr Program Acceptable for Full Credit Transfer to BA Program
 - √10 Program leads to at least an Associates Degree, Excelled in High School, and met the Admissions Requirements



Valid values for the <StudentEligibilityCode> tag

- 01-Ability To Benefit Testing Completed
- 02-College Credits
- 04-Home Schooled
- 06-High School Diploma
- 07-GED Certificate of State Equivalent Test
- 08-State Authorized High School Equivalent Certificate
- 09-Academic Transcript of a 2-Yr Program acceptable for full credit transfer to a Bachelor's Program
- 10-Program leads to at least an Associates Degree, Excelled in High School, and met the Admissions requirements



Modifications to the COD System to Comply with Changes to the Direct PLUS Loan Program



First, what triggers a credit check?

- COD receives a Direct PLUS Loan LOR (loan origination record)
- A change in Direct PLUS Loan borrower identifiers where the credit decision is pending or denied at origination
- Instant on-line credit check performed by the school via the COD website
- Completion of a "PLUS Request" via the StudentLoans.gov website



Effective March 29, 2015...

- Extension of the expiration date on credit checks from 90-days to 180-days
- Updated adverse credit history criteria for ALL credit checks performed on or after March 29, 2015
- Updated electronic & paper communications to schools and borrowers
- New PLUS Counseling requirement
- New "Credit Requirements Met" tag
- New Credit Status Response (Doc Type CS)
- New Credit Status Report
- Updated COD and StudentLoans.gov website screens



The expiration date on credit checks on the COD database will be extended from 90-days to 180days upon implementation

- COD will identify those borrowers whose credit check has been extended and provide that information via a spreadsheet to the school
 - ✓ ALL credit checks performed within 180-days of the date the file is generated
 - ✓ Displays the new credit check expiration date."
 - ✓ Posted to the COD website for download
 - ✓ Access via the "File Share/Messages" link under the COD School Information screen

As of March 29, 2015, COD will consider an applicant to have an adverse credit history if, as of the date of the credit report, the applicant...

- Has a default determination, bankruptcy discharge, foreclosure, repossession, tax lien, wage garnishment, or write-off of a Title IV debt during the preceding five years OR
- Has one or more debts with a combined outstanding balance > \$2,085, and that are 90 or more days delinquent or charged off/in collection within the preceding two (2) years



Updated adverse credit history will apply to ALL Direct PLUS Loan credit checks performed on or after March 29, 2015

- NOT award year specific
 - ✓ A credit check performed on or after March 29, 2015, will be used for the upcoming 2015 – 2016 award year AND
 - ✓ A late Spring 2015 or Summer 2015 Direct PLUS Loan application
 - ✓ No impact on the eligibility of a borrower who had previously been approved to receive a Direct PLUS Loan for all or part of the 2014-2015 academic year including Spring and/or Summer 2015 terms

Borrowers whose Direct PLUS Loan credit checks are processed on or after March 29, 2015 and who are denied based on an adverse credit history...

- Can secure an approved endorser
 - √ The endorser is subject to, and must pass, the same credit check as the applicant
- Can successfully appeal on extenuating circumstances
- In both cases, the applicant will be REQUIRED to complete PLUS Counseling
 - ✓ PLUS Counseling MUST be completed before disbursement of the Direct PLUS Loan funds
 - ✓ A completed PLUS Counseling session remains valid for the duration of the associated credit check
 - ✓ Electronic & paper communications to borrowers will be updated and carry information on PLUS Counseling



PLUS Counseling

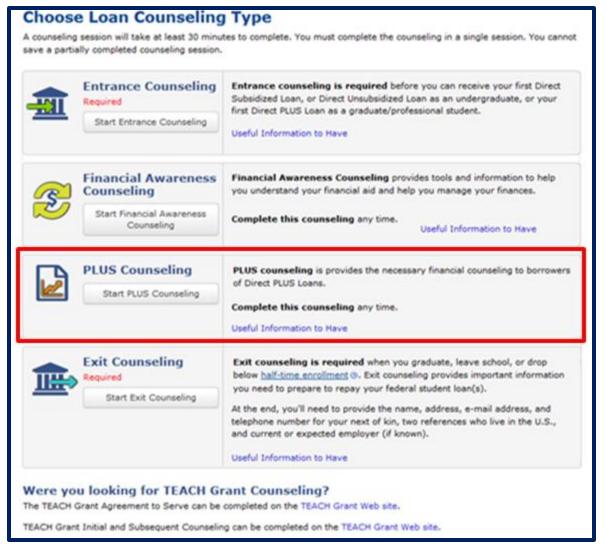
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PLUS Counseling is a distinct and unique counseling module

- PLUS Counseling is NOT Entrance Counseling and does not fulfill the Entrance Counseling requirement for first-time Graduate/Professional Student
 - ✓ Some first-time Graduate/Professional students will be required to complete both modules
- PLUS Counseling is provided ONLY via the StudentLoans.gov (SLG) website
 - ✓ Schools are NOT responsible for providing PLUS Counseling



Modifications to SLG will transition an applicant with declined credit into a PLUS Counseling module

- Parent and Grad PLUS Counseling process
- English only
 - ✓ Error message displayed if Spanish is selected
- Must be done in one "sitting"
 - ✓ Drafts will NOT be saved to be completed at a later time
- NSLDS loan data retrieved for authenticated users
- Available to anyone
- A demo will be available outside authentication



PLUS Counseling Overview

Return to Top

Hi, PLUS Counseling User!

You are required to take this PLUS Counseling session due to your credit check results. It will help guide you through understanding your current debt and give you information about how to avoid defaulting on your student loans. Your credit details are below.

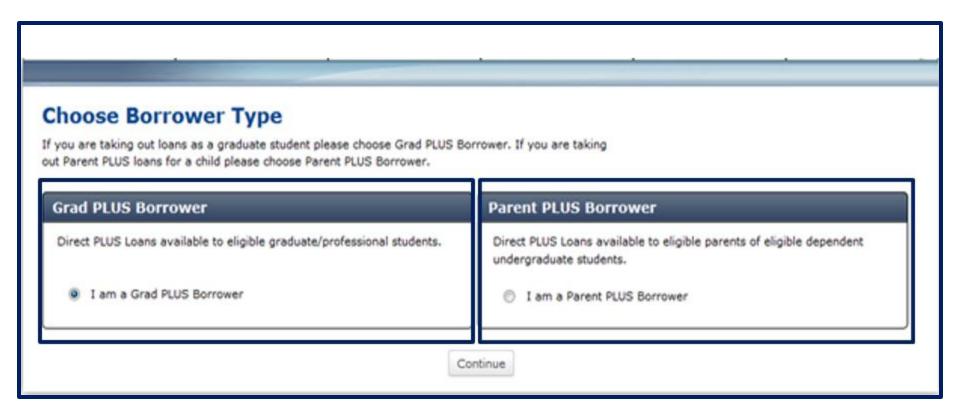
Credit Details

You have received an adverse credit decision for the following reasons:

- Bankruptcy
- Charged off account

You may still be eligible to receive a Direct PLUS Loan. In order to become eligible you must complete PLUS Counseling and take one of the following actions:

- 1. Obtain an endorser. More Information
- 2. Document extenuating circumstances to the satisfaction of the U.S. Department of Education. More Information



"Credit Requirements Met"

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COD will send a new <CreditRequirementsMet> tag

- Confirms that all credit related requirements have been met and the PLUS loan can be disbursed
 - ✓ An approved endorser or approved appeal
 - ✓ PLUS Counseling has been completed
- Sent in the Common Record response (Doc Type RS), a StudentLoans.gov PLUS Request response (Doc Type SP), and a failed COD Web credit check (Doc Type WB)
- Will also be sent in the new system-generated Credit Status response (Doc Type CS)
- "Credit requirements met" does NOT mean that other eligibility requirements, i.e., a linked MPN, appropriate enrollment status, etc. have been met



The new "Credit Requirements Met" should be your focus...

- You can't disburse on the PLUS Loan until this is true
 ✓ New COD Reject Edit #217
- If this field remains FALSE for any length of time you need to start looking at the other information included in the new Credit Status system-generated response (Doc Type CS)
 - ✓ Is the credit decision pended? Identifier information has to be resolved
 - ✓ Has he or she submitted a credit appeal? What is the status of the appeal?
 - ✓ Has he or she secured an endorser and has that endorser been denied or accepted?
 - ✓ Is PLUS Counseling complete?



COD will begin sending a new system-generated Credit Status Response (Doc Type CS)

- Sent with the intent to keep the school "in the loop" on a borrower that may be in the process of "resolving" his or her denied credit decision
 - ✓ Sent on approval or denial of an endorser/appeal
 - ✓ Sent when special PLUS Counseling is completed
 - √ Will include the <CreditRequirementsMet> tag
- Contains additional information pertinent to the PLUS Loan including, but not limited to...
 - ✓ Original Credit Decision
 - √ Credit Decision Expiration Date
 - ✓ Endorser Amount
 - ✓ Endorser Code



"Credit Status System-Generated Response"

(Doc Type CS)

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- Original Credit Decision Status
 - ✓ Always sent
 - ➤ "A" if approved
 - ➤ "D" if Denied
- Credit Decision Date
 - ✓Always sent
- Credit Decision Expiration Date
 - ✓Always sent



- Credit Appeal Status
 - ✓Populated if there is a valid Credit Appeal linked to the borrower's credit check
 - ➤ "A" if approved
 - ➤ "D" if Denied
 - ▶ "P" if Pended
 - ➤ "R" if Closed
- Sent ONLY if the borrower has appealed



- Credit Action Status
 - ✓ Populated if there is an endorser submitted to COD
 - "D" indicates an endorser addendum has NOT been linked and has been denied as a result of the endorser's adverse credit history
 - "N" indicates the credit result has changed after resolving a Pending result
 - "L" indicates the endorser is approved but for a lesser amount than the denied PLUS Loan award amount
 - "R" if Closed
 - Sent ONLY if one of the three values apply

- PLUS Counseling Completed
 - ✓Always populated
 - > "Y" or "N"
- PLUS Counseling Completed Date
 - ✓ Populated if PLUS Counseling Completed = "Y"
- Reconsideration Eligible
 - ✓Always populated
 - > "Y" or "N"

- Endorser Approved
 - ✓ Sent ONLY when an endorser addendum is processed
 - ➤ "TRUE" if the endorser is approved
 - "FALSE" if the endorser is denied
- Endorser Amount
 - ✓ Sent ONLY when an endorser addendum = TRUE
- Response Error Code
 - ✓A warning edit #184 is sent when the Endorser Amount is less than the denied PLUS Loan award amount

- Credit Requirements Met
 - ✓Always sent
 - "TRUE" if PLUS Counseling has been completed
 - ➤ "FALSE" if PLUS Counseling has NOT been completed
- Endorser Amount
 - ✓ Sent ONLY when an endorser addendum = TRUE
- The Credit Override (Doc Type CO) system-generated response will be retired

Other COD Changes

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COD will create a new weekly "Credit Status Report"

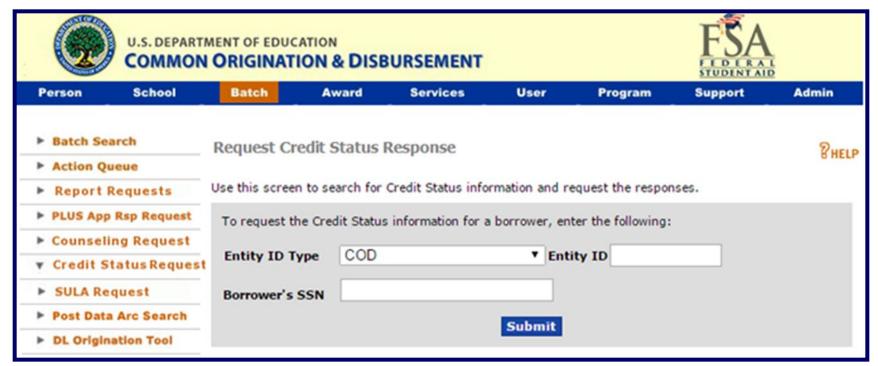
- Posted weekly to the COD Website
 - √Your School NewsBox
 - ✓Under the "Services" tab
 - ✓ COD Reports hyperlink
- CSV (Comma Separated Value) format
- Saturday to Friday reporting window
- A borrower without a PLUS Request of Direct Loan PLUS award(s) will not be included in the report

The "Credit Status Report" identifies borrowers whose most recent original credit decision is "Denied" and is NOT expired

- Will indicate "Credit Requirements Met"

 "Y" or "N"
- A borrower drops off the report 30 days after
 - √Credit Requirements Met is flagged TRUE
 - √The Direct PLUS Loan award is reduced to \$0.
 - √The credit decision expiration date has been reached
- The "Reconsideration Eligibility Report" will be retired

A new "Credit Status Request" screen will be added to the COD Website under the Batch tab for on-demand Credit Status Responses

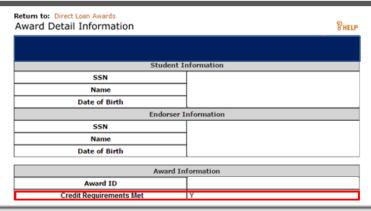


COD Modifications for PLUS Counseling

COD will modify the COD Website screens below

- Batch Response Screens will be updated to include the new Credit Status (Doc Type CS) system-generated response
- Common Record (CR), Web (CS), and PLUS Request (SP) Response Information screens will be updated to include the new "Credit Requirements Met" field
- The Award Information screen will be updated to display the "Credit Requirements Met" field

Award Detail
Information screen
on a post
implementation
award*



Award Information	
Υ	
N	
\$1,000.00	
\$0.00	
\$1,000.00	
\$0.00	

*XML Schema 4.0b

Less than run-time riag	I
Loan Default / Grant Overpay	N
Ability to Benefit	College Credits
School Use Only	

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Resources

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COD Modifications for PLUS Counseling

Electronic Announcements

- EA dated January 27, 2013
- EA dated February 3, 2015
- Upcoming EAs
 - ✓ More to be posted over the next several weeks
- We're planning on delivering a COD Release for Award Year 2015 – 2016 webinar in March
 - ✓ Watch for registration announcement coming to ifap in a few weeks
- COD Technical Reference for Award Year 2015 2016





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