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AGENDA

- Federal Direct PLUS Loan Basics
 - ✓Eligibility
 - ≻School
 - ≻Borrower
- Master Promissory Note (MPN)
- Credit Check
- Counseling
- Processing Federal Direct PLUS Loan data

 Originating
 Disbursing
- Repayment



The Basics

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PLUS Loan - Basics

- Two categories of borrowers...Parents of a dependent student and graduate/professional students
- Can be used to cover expected family contribution (EFC)
- PLUS loans are limited in amount to the Cost of Attendance (COA) less any estimated financial assistance (EFA)
- PLUS borrowers must undergo a credit check





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- School eligibility General
 - Same as Direct Subsidized/Unsubsidized Loan Program
 - ✓ Reflected as separate program PPA/eCAR
 - ✓Option to participate or not
 - Non-participation is NOT grounds for offering or awarding additional unsubsidized funds to a dependent student
 - You must first inform a graduate/professional student of his or her eligibility for a Direct Unsubsidized Loan before offering and awarding a Direct PLUS Loan



- Borrower eligibility General
 - ✓A borrower (and student for whom parent is borrowing) must meet Title IV eligibility requirements found in 34 CFR 668 Subpart C
 - School determines borrower eligibility and loan amount
 - ✓A borrower cannot have an adverse credit history as defined in CFR 685.200

- Parent borrower must be the student's biological or adoptive Mother or Father
 - ✓A step-parent is considered a parent if married to a biological or adoptive parent and if the student counts in their household size.
 - ✓A legal guardian is not an eligible borrower
 - Not eligible if delinquent on a debt to the Federal Government, or incarcerated



- A parent can borrow for multiple dependent students
 Unique parent/dependent student "pair" for each PLUS Ioan
 Unique PLUS Request via StudentLoans.gov website
 - Unique Master Promissory Note (MPN) for each parent/student "pair"
 - StudentLoans.gov will retain parent/student "pair" data for subsequent PLUS loans



- Graduate or professional student
 - ✓ Eligible award year 2005-2006 and forward
 - School MUST determine eligibility for, and offer, Direct Unsubsidized Loan first
 - Graduate/Professional students no longer eligible for subsidized loans
 - Must meet Title IV eligibility requirements
 - Must be enrolled at least half-time in an eligible program at an eligible school



Master Promissory Note (MPN)

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PLUS Loan – MPN

- Unique MPN NOT a subsidized/unsubsidized loan MPN
 - ✓XXXXXXXXXN16GXXXXX001
- Contains borrower and/or student data
- PLUS MPN used for ALL PLUS loans
 ✓No financial data on the MPN
- Links on the SSN, DOB, and first two characters of the first name of both borrower and student
 - ✓Unique MPN for each parent/student "pair" if multiple dependent students
- <u>Expires</u> 10 years from date of receipt at COD
 ✓12 months if there's no disbursement on a linked loan



PLUS Loan – MPN

- Single-Loan MPN
 - When an endorser is linked to the PLUS Loan MPN
 - Linked MPN reflects a status of "Inactive-Endorser"
 - ✓Any future loan will need a new MPN





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In the words of that Great American Philosopher, Bob Dylan...

"The Times They Are a Changin"

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PLUS Loan - Credit

- Effective March 29, 2015...
 - ✓Credit checks will remain valid for 180 days
 - ✓Updated adverse credit history criteria
 - > On credit checks performed on or after March 29, 2015
 - ✓PLUS Counseling Requirement
 - ✓"Credit Requirements Met" tag
 - ✓ System-generated Credit Status Response (Doc Type CS)✓ Credit Status Report
 - Updated COD and StudentLoans.gov Website screens
 - Updated COD/StudentLoans.gov communications explaining the PLUS Counseling Requirement



PLUS Loan - Credit

- A credit check will "stand" as valid on the COD database for 180 days
 - ✓The expiration date of credit checks on the COD database will be extended from 90 days to 180 days
 - On credit checks performed within the previous 180 days
 - ✓COD will generate and send to schools a spreadsheet identifying credit checks that were extended from 90 days to 180 days and their new expiration date
 - The file is accessed via the "File Share/Messages" link under the COD School Information screen on the COD Website

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PLUS Loan - Credit

- 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 (5) years

OR

✓Has one or more debts with a combined outstanding balance exceeding \$2,085, and that are 90 or more days delinquent or charged off/in collection within the preceding two (2) years



PLUS Loan - Credit

- Updated adverse credit history criteria 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 linked to a Direct PLUS Loan for award year 2015-2016

AND/OR

- A late Spring 2015 or Summer 2015 Direct PLUS Loan for award year 2014-2015
- ✓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 terms

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PLUS Loan - Credit

- A borrower whose credit check is performed on or after March 29, 2015, and whose credit check result is "Denied"
 Can secure an approved endorser
 Can successfully appeal the "Denied" credit result
- In both cases the applicant will be REQUIRED to complete PLUS Counseling
 - PLUS Counseling MUST be completed before disbursement of PLUS Loan funds
 - A completed PLUS Counseling session remains valid for the duration of the linked credit check

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PLUS Loan – PLUS Counseling

- PLUS Counseling is a distinct and unique counseling module
- PLUS Counseling is NOT Entrance Counseling and does not satisfy the Entrance Counseling requirement for a firsttime Graduate or Professional student
 - Some first-time Graduate and/or Professional students will be required to complete both modules
- Plus Counseling is provided ONLY via the StudentLoans.gov Website

✓A school is NOT responsible for providing PLUS Counseling

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"Credit Requirements Met"

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PLUS Loan – "Credit Requirements Met"

- COD will send a new <CreditRequirementsMet> tag that confirms all CREDIT RELATED* requirements have been met
 - An original credit decision of "Accepted"

OR

✓An approved endorser

OR

An approved appeal of the "Denied" credit result

AND

✓A completed PLUS Counseling session

*Does not mean ALL eligibility requirements have been made, i.e., a linked MPN, enrollment status, citizenship, SAP, etc.



PLUS Loan – "Credit Requirements Met"

- COD will begin sending a new system-generated Credit Status Response (Doc Type CS) that includes the Credit Requirements Met flag
 - Keeps you "in the loop" on a borrower's attempt to resolve a "Denied" credit decision
 - Sent on the approval or denial of an endorser or credit decision appeal
 - Sent when PLUS Counseling is completed
 - Contains additional credit related information
 - Original Credit Decision
 - PLUS Counseling completed date
- The Credit Override Response (Doc Type CO) will be retired



PLUS Loan – "Credit Requirements Met"

Credit Requirements Met should be your focus!

- ✓You can't disburse until all credit requirements are met
 ➢ New COD Reject Edit #217
- If the <CreditRequirementsMet> tag remains FALSE for any length of time you need to look at the other information included on the CS Response
 - Is the credit decision Pended? Identifier information has to be resolved
 - Has he or she submitted an appeal? What is the status of the appeal?
 - Has he or she secured an endorser? Has the endorser been approved or denied?

✓Has he or she completed PLUS Counseling?



PLUS Loan – Other COD Changes

- COD will post a new Credit Status Report
 - ✓ Identifies borrowers whose most recent original credit decision is "Denied" and is not expired
 ✓ Will indicate "Credit Requirements Met"
- Borrowers will drop off the report 30 days after...
 Credit Requirements Met flagged TRUE
 - ✓The associated Direct PLUS Loan award is reduced to \$0
 ✓The credit decision expiration date has lapsed

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- Other COD screens and Responses to accommodate
- the new credit associated data

Award Detail Information screen on a post implementation award*

Return to: Direct Loan Awards Award Detail Information	PHELP	
Student Information		
SSN		
Name		
Date of Birth		
Endorser Information		
SSN		
Name		
Date of Birth		
1		
Award Information		
Award ID		
Credit Requirements Met	Y	

Award Information		
Award ID		
Credit Requirements Met		Y
PLUS Loan Reconsideration Flag		N
Endorser Amount		\$1,000.00
Award Amount Requested		\$0.00
Award Amount Approved		\$1,000.00
Award Amount Disbursed		\$0.00
	Less than run-time riag Loan Default / Grant Overpay	N

*XML Schema 4.0b

Loss than Full-time Flag
Loss than Full-time Flag
N
Ability to Benefit College Credits
School Use Only

UPDATE AWARD

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Credit - continued

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PLUS Loan - Credit

- ALL Direct PLUS Loan Borrowers undergo a credit check
- Initiated by the school or the borrower
 - The school via the loan origination record (LOR)
 - The school online via the COD website
 - ✓The borrower via a Direct PLUS Request on the StudentLoans.gov website
- If done online by the school or the PLUS borrower you should originate the PLUS loan if borrower is otherwise eligible



PLUS Loan - Credit

- MUST have borrower authorization to perform a credit check
 - Authorization is in the text on a Direct PLUS Loan MPN
 - Form downloadable off of the COD Website
 - Hand written/faxed & signed authorization
- The SSN is the key identifier for a credit check and if changed will trigger a new credit history



Federal Direct PLUS Loan - Credit

- Denial of one parent is sufficient to offer additional unsubsidized loan funds to that dependent student
 - Other parent does NOT have to undergo PLUS loan process
 - A credit result of Declined is not school specific and can be used across schools on loans with the same academic year



Federal Direct PLUS Loan - Credit

- School can offer additional unsubsidized loan funds to a dependent student after determination of the inability of the Parent to borrow due to *exceptional circumstances*
 - ✓ Forego the PLUS Request process altogether
 - Even if the parent's credit was already approved
 - ✓34 CFR 685.203(c)(1)(ii)
 - ✓ DCL ID: GEN-11-07
 - ✓Case-by-case
 - ✓ DOCUMENT reason for determination of ineligibility



Federal Direct PLUS Loan - Credit

- PLUS loan with credit declination can be accepted and displayed on COD but with an unacceptable credit decision
 - Can't disburse unless and until credit denial is resolved by a successful appeal via COD or by borrower securing an endorser
 - Initial declined credit status remains on the COD website and is NOT changed after a successful appeal or securing an endorser



- Federal Direct PLUS Loan Credit Appeal
 - Appeal on extenuating circumstances...
 - ✓Documents to the satisfaction of the Secretary the existence of extenuating circumstances related to the adverse credit history
 - Appeal based on errant data from the Credit Bureau
 - Appeal by submitting via fax the specific documents requested by COD
 - Can start appeal process on StudentLoans.gov



- Federal Direct PLUS Loan Credit Appeal
 - Credit Check Reconsideration
 - ✓Initiated by COD Customer Service
 - Contact with declined borrower via email
 - COD CSR explains the process and their option to pursue or decline
 - ✓ If accepted the approval will impact any already awarded/disbursed unsubsidized funds
 - Virtually all "Reconsideration Appeal" applicants are immediately approved
 - The Reconsideration Report will be discontinued



- Federal Direct PLUS Loan Endorser
 - CANNOT be the student for whom the loan is intended
 - ✓Endorser undergoes a credit check
 - Endorsed loan reported to credit bureau as any other financial obligation
 - Endorser promises to pay outstanding principal balance, accrued interest, any penalties, AND any collection costs
 - ✓ Endorser completes an Endorser Addendum, NOT another MPN

✓Paper or electronic via StudentLoans.gov



Federal Direct PLUS Loan - Endorser

- You CANNOT disburse more than the endorsed amount
 ✓ Endorsed amount and endorser data is displayed on the COD Loan information screen
 - ✓ Endorser approved tag on the CS Response
 - If endorsed for a lesser amount a warning edit #184 and the endorsed amount tag filled on the CS Response
- You CANNOT increase an endorsed PLUS Loan
 - You must originate a subsequent PLUS Loan for the requested increase
 - A new credit history will be run on the borrower if more than 180 days have lapsed since the initial credit history



Federal Direct PLUS Loan - Entrance Counseling

- First-time graduate & professional student PLUS borrower MUST complete PLUS entrance counseling prior to disbursement
 - ✓NOT the same as the new PLUS Counseling requirement
 - ✓NOT the same as undergraduate entrance counseling
 - Some first-time Graduate/Professional Students who are determined to have an adverse credit history may be required to complete both Grad Entrance and PLUS Counseling
 - ✓Offered at StudentLoans.gov
 - Results sent to COD in Doc Type "EC" from StudentLoans.gov
 - Schools are NOT required to use FSA online counseling



Federal Direct PLUS Loan - Processing

- School is responsible for determining eligibility for, and amount of, the PLUS award
 - Anticipated and/or actual disbursements = loan amount
 - ✓Up to 20 actual disbursements
 - Report ACTUAL date of disbursements
 - ✓Origination fee assessed on each actual disbursement
 - ➤4.292% on loans with an EDD on or after October 1, 2014 and before October 1, 2015



Federal Direct PLUS Loan - Origination

- Via "batch" by submission of a Common Record (CR)
 - ✓CR response returned reflecting status of award, credit, actual disbursement (if applicable) and MPN
- Individually online at COD website
 - Immediate editing of submitted data
 - Manually create an award from the "Person Information" screen and "submit"
 - Automatically create a "skeleton" award from the "SP" acknowledgement from StudentLoans.gov



Federal Direct PLUS Loan - Processing

- CAVEAT a school can decline to originate, or originate a lesser loan amount than requested, on a case-by-case basis
 - ✓You MUST document the reason
 - ✓You cannot do so on an across-the-board basis
 - √34 CFR 685.301(a)(8)



Federal Direct PLUS Loan - Disbursement

- Assure eligibility of the dependent student
- Unless otherwise directed, any credit balance is given to the parent
- Generate and deliver the required school notifications
- Disburse via batch or online via the Award Disbursements Information screen

✓Also disburse from the Action Queue



Federal Direct PLUS Loan - Disbursement

- The disbursement data MUST be accepted by COD within 15 days of the actual date of disbursement
- You must report the ACTUAL DISBURSEMENT DATE
 - The date award funds are credited to the student's account or otherwise made available to the student/borrower
 - Can be reported 7 days prior to the actual disbursement date
 - If the anticipated disbursement date is not the actual date of disbursement, CHANGE IT!



Federal Direct PLUS Loan - Disbursement

- You may increase a PLUS loan already established on the COD database
 - ✓Change record if software allows
 - New PLUS loan for the difference requested
- But you *cannot* increase an established PLUS loan if in receipt of a subsequent adverse credit decision
 - ✓If the established PLUS loan is NOT fully disbursed you can fully disburse it
 - ✓Alternatively, reduce remaining disbursements to \$0 and offer student unsubsidized funds up to their eligibility for grade level and need



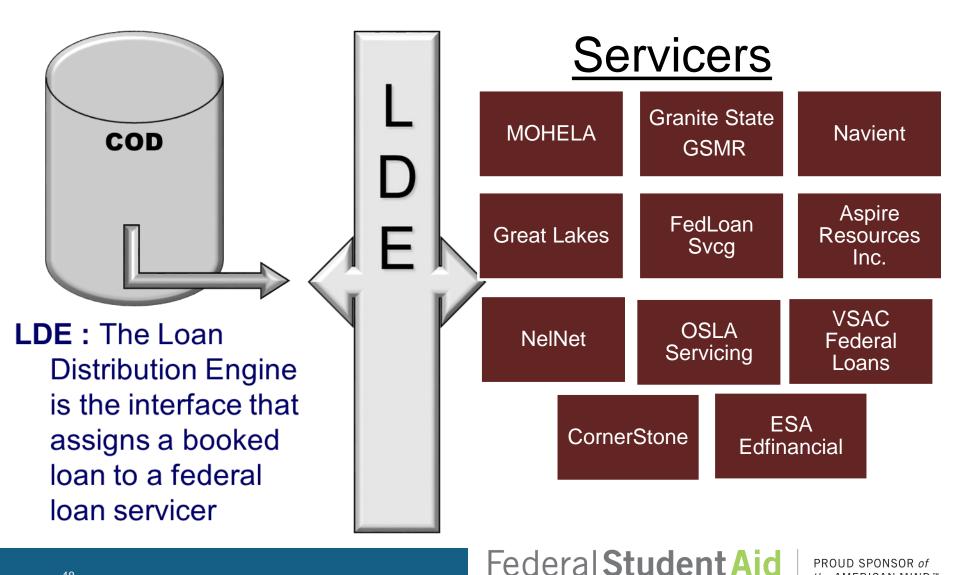
Federal Direct PLUS Loan - Disbursement

- If the established PLUS loan has been fully disbursed...
 - ✓Offer the dependent student an additional unsubsidized loan up to their eligibility appropriate to their grade level and remaining need



- Federal Direct PLUS Loan Booking
 - Once COD has received an accepted LOR, a linked MPN, and an actual disbursement the PLUS loan is "booked"
 - Liability for funds transfer from the school to FSA
 - ✓ Generally, disbursement #1, sequence #1 books the loan
 - ✓ Each subsequent disbursement books as well
 - ✓When the loan is booked it is assigned to a Servicer
 - Liability for any drawn funds migrates from the school to FSA





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Federal Direct PLUS Loan - Repayment

- Deferment and Forbearance options available
 - Parent can request to defer repayment while dependent student, or parent, is enrolled at an eligible school more than half-time
 - > Student does not need to request in-school deferment
 - ✓Parent can request to defer repayment for an additional six months from the date the dependent student ceases to be enrolled on at least a half-time basis

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- Federal Direct PLUS Loan Repayment
 - Repayment options much like subsidized/unsubsidized loan borrowers
 - ✓Standard
 - ✓Graduated
 - ✓Extended
 - Must have outstanding loan balance > \$30,000
 - Income dependent repayment plans are NOT available for parent PLUS loan
 - Income-contingent repayment plan available for Direct Consolidation Loan that includes an underlying Parent PLUS Loan



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

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COD Technical Reference for Award Year 2015 – 2016
 Volume II, Section I, "Implementation Guide"



Resources...

- Code of Federal Regulations
 - √34 CFR 685
 - ✓34 CFR 668 (General Student Assistance Provisions)
- COD School Relations Center
 - **√800.848.0978**
 - ✓CODSupport@ed.gov
- Your Federal Loan School Support Team Point of Contact
 - ✓Dlops@ed.gov





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