This chapter provides assistance to Schools, EDExpress Users, Third-Party Servicers, and Software Providers with implementing the COD System for the 2021-2022 Pell Grant, TEACH Grant, Iraq and Afghanistan Service Grant, and Direct Loan Programs. It serves as a companion to the 2021-2022 Overview of Changes, Common Record Layout and Edit Codes contained in this Technical Reference. This document and the XML Common Record Schema v4.0e are available at Knowledge Center Home | Home.

For Academic Competitiveness Grant and National SMART information, reference the Technical Reference from Award Years 2006-2007 through 2011-2012.

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Common Record XML Schema Guidelines

The Common Record XML Schema guidelines reflect accepted industry practices.

Business Rules

1. The Common Record XML Schema contains the validation rules for the Common Record document that is transmitted to COD.

2. XML Schema version information is reflected in the Namespace attribute xmlns and its value in the root element of the Common Record document. (e.g. 
   
   ```xml
   <xsd:schema targetNamespace="http://www.ed.gov/FSA/COD/2020/v4.0e"
   xmlns:xsd="http://www.w3.org/2001/XMLSchema"
   xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
   xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e"
   elementFormDefault="qualified">
   <xsd:element name="CommonRecord"
   type="cod:CommonRecordType">
   ```

3. The Namespace attribute and its value are required on all 2003-2004 and forward submissions and are echoed back in the response file.

4. The XML Schema and the namespace attribute can be used throughout the development and testing of a system to validate the system’s XML document output. For example, if a 4.0a Namespace is submitted containing 4.0b elements, it is likely that there is a software configuration problem.

5. XML Schema validation is performed prior to business rule processing. If the incoming batch fails XML validation, the student and award information contained within the batch will not be processed by COD.

6. In 2014, the COD System began returning an error response file containing edit 210 on the <DocumentID> tag, indicating that the record failed schema validation, if the incoming common record fails schema validation. In the past, files that failed to process did not receive a response file. These files will contain the same structure as a batch level reject response file and will contain the edit 210.
In March 2017, the COD System retired warning edit 211 for records submitted in the 4.0c schema. All records submitted in the 4.0c schema must pass full schema validation.

**EDExpress for Windows 2021-2022**

EDExpress for Windows 2021-2022, (available Spring 2021) communicates to COD using the Common Record in XML for Pell Grant, TEACH Grant, and Direct Loan awards. The External Import Add and Change files and External Export files for EDExpress Combination System users continue to be offered in fixed-length format and not XML.

**Business Rules**

1. EDExpress for Windows 2021-2022, Release 2.0 exports and imports the XML Common Record to and from COD.

2. EDExpress Users should refer to the sections within *Volume III – Common System Technical Reference* of this technical reference as their reference tool.

3. The External Import Add and Change files and External Export files used by EDExpress 2021-2022, Release 2.0 to interface with Combination and Mainframe Systems are offered in fixed-length format and not XML for 2021-2022. Users with Pell, TEACH Grant and/or Direct Loan systems used in combination with EDExpress should refer to *Volume III – Combination System Technical Reference* of this technical reference.

4. All reports continue to be produced and imported into EDExpress in current formats and not XML.
2021-2022 Common Record XML Schema

All tag names in the 2021-2022 Common Record XML schema v4.0e reflect standards and recommendations from the Post-Secondary Electronic Standards Council. The Common Record XML schema v4.0e latest release is available at Knowledge Center Home | Home.

Business Rules

1. All Common Record document submissions for the 2021-2022 Award Year and forward must conform to Common Record XML schema version 4.0e.

2. All Common Record document submissions for previous award years must conform to the Common Record XML schema version 4.0e, or previous schema versions 4.0d, 4.0c, 4.0b, 4.0a, 3.0e, and 3.0d.

3. System-generated documents for all award years are sent in the highest XML schema version, 4.0e. Web responses are also sent out in this schema version.

4. All Responses are returned in the same Common Record XML schema version as the submitted Common Record document.

5. The COD System uses the Document Information Block Common Record root element `<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e">` as an indicator of the XML schema version to which the Common Record document conforms. The COD System processes the Common Record Document using the XML schema version indicated by this tag.

Maximum Length Values and Leading Zeroes

XML does not require that the data for a specific tag occupy the maximum length. However, the data cannot exceed the maximum length specified for a tag or the batch cannot be processed. Refer to the Common Record Layout topic in Volume II, Section 3 – Common Record Layout for “max length” valid field lengths.

The following tags will have the leading zeroes removed from the System Generated Response files with the 3.0e schema version going forward:

- Financial Award Number
- Total Eligibility Used (TEU)
- Lifetime Eligibility Used (LEU)
- Disbursement Number
- Disbursement Sequence Number
- Previous Sequence Number
- DL Loan Information Award Key
- Award Key
- Counseling Sequence Number

Please see the Common Record Schema Guidelines topic for more information about editing against the Namespace attribute.
• Application ID
• Previous Application ID

Business Rules
1. Do not include leading zeroes and spaces to satisfy the maximum length for a given tag.

Example 1
In the example below, the student’s first name, John, is four characters long. Although the first name tag has a maximum length of 12 characters, leading zeroes or spaces are not necessary to occupy the maximum length of the tag.

```xml
<FirstName>JOHN</FirstName>
```

Example 2
In the example below, the Disbursement Amount is 400.00. Although the disbursement amount tag has a valid value up to 99999999.99, leading zeroes or spaces are not necessary to occupy the length of the tag.

```xml
<DisbursementAmount>400.00</DisbursementAmount>
```

Empty (Blank) and Null Tags
The COD System differentiates between a tag being empty (blank) and a tag being null in the database.

Business Rules
1. An empty tag is one in which content of the tag equals blank or spaces.

2. An empty tag is reported as:
   `<PhoneNumber></PhoneNumber>`
   or
   `<PhoneNumber/>

3. Tags not necessary or not applicable for the document submission should be omitted, rather than reported as empty. Please see examples 1, 2.

4. A blank tag is reported as:
   `<PhoneNumber></PhoneNumber`

5. Tags that are defined as enumerated lists and can contain blank as a valid value have `<xsd: enumeration value=""/>
   defined for them in the XML Common Record Schema.

6. If a school reports blank for a tag defined as an enumerated list that does NOT have blank as a valid value defined in the XML Common Record Schema, the file will fail XML validation and will not be processed by the COD System.
7. If a school reports a blank value for a tag that does have blank as a valid value defined in the XML Common Record Schema, blank will override the data in the COD database.

8. A null tag is used to remove or delete content currently on the COD database.

9. A null tag (nil="true") is reported as:
   `<PhoneNumber xsi:nil="true"/>`

10. Tags that can contain null values have a nil="true" attribute set for them in the XML Common Record Schema.

11. If a tag has a “min occurs” value greater than zero and the school has no content to report in that tag, the school must report a null tag.

**Example 1**
If a student does not have a middle initial, the Middle Initial tag should be omitted from the Common Record, rather than reported as empty or blank.

```
<Name>
    <FirstName>SUE</FirstName>
    <LastName>SMITH</LastName>
</Name>
```

**Example 2**
For Direct Loans, the Additional Unsubsidized Loan for Health Professionals Indicator, `<HPPAIndicator>`, is not necessary if the student does not qualify. In these cases, this tag should not be included in the document, rather than reported as empty.
Data Types

The Common Record includes the following data types:

- Date
- Date/Time
- Year
- Year/Month
- Decimal
- Integer
- String
- Boolean

Each of these data types is discussed in detail below.

**Date Fields**

All date fields on the Common Record use the following format: CCYY-MM-DD. Dates that are not formatted using this format and the appropriate date range values will fail XML validation.

**Business Rules**

1. The dashes must be included.
2. The CC designates the Century (19-20).
3. The YY designates the Year (00-99).
4. The MM designates the Month (01-12).
5. The DD designates the Day (01-31).
6. A leap year is defined as one in which the value of YY is divisible by four (4).
7. In a leap year, the valid values for DD are “01 – 29” when MM is equal to “02”.

**Date/Time Fields**

All date/time fields on the Common Record use the following format: CCYY-MM-DDThh:mm:ss.ff.

**Business Rules**

1. The punctuation marks (dashes, colons and decimal point) must be included.
2. The CC designates the Century (19-20).
3. The $YY$ designates the Year (00-99).
4. The $MM$ designates the Month (01-12).
5. The $DD$ designates the Day (01-31).
6. The $T$ is the date/time separator.
7. The $hh$ designates the Hour.
   a. The $hh$ must be submitted in 24-hour clock time.
8. The $mm$ designates the Minutes.
9. The $ss$ designates the Seconds.
10. The $ff$ designates the hundredths of a second. This value may be zero (00).

**Year Fields**

All year fields on the Common Record use the following format: $CCYY$.

**Business Rules**

1. The $CC$ designates the Century.
2. The $YY$ designates the Year.

**Year/Month Fields**

All year fields on the Common Record use the following format: $CCYY$-$MM$.

**Business Rules**

1. The $CC$ designates the Century.
2. The $YY$ designates the Year.
3. The $MM$ designates the Month.

**Decimal Fields**

Decimal fields on the Common Record are either dollar amount fields or percentage fields. Each of these field types is described in detail below.

**Dollar Amount Fields**

Dollar amount fields on the Common Record use the following format: -$999999.99$ to $999999999999.99$.

**Business Rules**

1. Leading zeroes are not necessary to occupy the maximum length of the field.
2. Dollar amount fields may include two digits to the right of a decimal point.
3. If a dollar amount reported by the school does not contain a decimal point, the COD System infers a decimal point and two zeroes after the last digit reported. Please see Example 1.

4. To report cents (partial dollar amounts), the school must submit a decimal point and the digits to the right of the decimal point. Please see Example 1.

5. When reporting a positive dollar amount, the school must submit amount fields without a sign indicator.

6. When reporting a negative dollar amount, the school must submit the amount field with the negative sign in the lead character, e.g. FISAP Income Amount. Please see Example 2.

7. Common Records may be returned to the source with a negative sign in the lead character of a dollar amount field, e.g. Payment to Servicer Amount. Please see Example 3.

8. The following fields on the Common Record are dollar amount fields:
   a. Total Award Amount Reported, <TotalReportedAward>
   b. Total Disbursement Amount Reported, <TotalReportedDisbursement>
   c. Award Amount, <FinancialAwardAmount>
   d. Federal Share Amount, <FederalShareAmount>
   e. FISAP Income Amount, <FISAPIncomeAmount>
   f. Award Amount Requested, <FinancialAwardAmountRequested>
   g. Cost of Attendance, <AttendanceCost>
   h. Disbursement Amount, <DisbursementAmount>
   i. Disbursement Net Amount, <DisbursementNetAmount>
   j. Disbursement Fee Amount, <DisbursementFeeAmount>
   k. Interest Rebate Amount, <InterestRebateAmount>
   l. Payment to Servicer Amount, <PaymentToServicerAmount>
   m. Booked Amount, <BookedAmount>
   n. Endorser Amount, <EndorserAmount>
Pennies
Pennies are not processed or stored by the COD System for the Direct Loan Program but are processed and stored for the Pell and TEACH Grant Programs. All Direct Loan reported amounts that include partial dollar amounts are truncated. Please refer to the Reporting Pennies in the Award and Disbursement Amount Data Elements topic for more information.

Example 1
When reporting an amount of $2625.34:

1. Include the decimal point and two digits to the right: 2625.34
   OR
2. Include the decimal point and two zeroes to the right: 2625.00
   OR
3. Omit the decimal point and report the whole dollar amount only:
   2625

Then, the COD System infers a decimal point and two zeroes and stores 2625.00.

Do not submit 262500 as the COD System infers a decimal and stores this submission as 262500.00.

Example 2
The Payment to Servicer Amount is returned with a negative sign as the lead character in the amount field.

<PaymentToServicerAmount>-1000.00</PaymentToServicerAmount>

Percentage Fields
Percentage fields on the Common Record use the following format: 0 – 999.999.
Business Rules
1. Leading zeroes are not necessary to occupy the maximum length of the field.

2. Percent’s must be reported as whole numbers or mixed numbers without the percent sign.

3. The following fields on the Common Record are percentage fields:
   a. Origination Fee Percentage, <OriginationFeePercent>
   b. Interest Rebate Percentage, <InterestRebatePercent>
   c. Total Eligibility Used, <TotalEligibilityUsed>
   d. Lifetime Eligibility Used <LifetimeEligibilityUsed>

Examples
Three percent (3%) is reported as 3 or 3.0 and the COD System stores as 3.000. One and a half percent (1.5%) is reported as 1.5 and the COD System stores as 1.500.

Integer Fields
Integer fields on the Common Record are non-dollar amount, non-percentage, numeric fields.

Business Rules
1. Integer fields contain whole numbers.
2. Integer fields do not contain decimal points, dollar or percent signs.

String Fields
String fields on the Common Record are alphanumeric fields that can contain a variety of characters.

Business Rules
1. String fields can contain all ASCII characters, except a raw unescaped opening angle bracket (<), ampersand (&), closing angle bracket (>), quotation mark ("), or apostrophe (’).

Boolean Fields
Boolean fields on the Common Record are fields that have exactly two values: true or false

Business Rules
1. Boolean fields contain a value of true or false.
XML Predefined Entity References

XML does not allow character data inside an element to contain a raw unescaped opening angle bracket (<), ampersand (&), closing angle bracket (>), quotation mark ("), or apostrophe ('). If these characters are necessary in your markup, they must be escaped using predefined entity references. An XML parser replaces the predefined entity references with actual characters.

XML predefines the following five entity references:

- `&lt;` — the less than sign (<)
- `&amp;` — the ampersand (&)
- `&gt;` — the greater than sign (>)
- `&quot;` — the straight, double quotation marks ("")
- `&apos;` — the apostrophe, straight quotation mark (’)

Refer to the XML Predefined Entity References topic for more information.
Common Record Processing Rules

Document
An XML document is the vehicle through which data is transmitted. A Common Record transmission is considered to be an XML document. A Common Record transmission, or document, may contain multiple awards and multiple disbursements for one or multiple students. In cases where the Reporting School transmits data for multiple Attended Schools, the Common Record may contain student, award, and disbursement data for multiple schools. It can be thought of as a batch.

Document Submission
Common Record documents can be submitted to the COD System via Batch Processing or the COD Web site.

Batch Processing
EDConnect Users: EDconnect users must upgrade to EDconnect version 5.3 or higher for their records not to reject. The most recent version of EDconnect available is v8.3.0.

All documents submitted via batch processing must be submitted via the Electronic Data Exchange over the Student Aid Internet Gateway (SAIG). For further information, please refer to the SAIG Host Communication Guide located at Software and Other Tools | Knowledge Center

Business Rules

1. All documents submitted via batch processing must be submitted via the Student Aid Internet Gateway (SAIG).

2. Each transmission must have an SAIG transmission batch header (O*N05) and trailer (O*N95) record.

3. Each transmission can include the SAIG transmission header (O*N01) and trailer (O*N99) record. Inclusion of the SAIG transmission header (O*N01) and trailer (O*N99) record is optional, and is not required for COD processing.

4. Only one set of Common Record begin and end tags can be submitted within each SAIG transmission batch header (O*N05) and trailer (O*N95) pair.

5. If more than one set of Common Record begin and end tags is submitted within SAIG transmission batch header (O*N05) and trailer (O*N95) pair, COD rejects the document with error code 105.

6. Multiple pairs of SAIG transmission batch headers (O*N05) and trailers (O*N95) can be submitted within the SAIG transmission headers (O*N01) and trailers (O*N99). Please see example below.
7. The variable length Batch Number field on the SAIG Transmission batch header (O*N05) and trailer (O*N95) occupies positions 42-91.

   a. Positions 42-61 are reserved for school use.

   b. Positions 62-91 are reserved for Department of Education use.

   c. COD populates positions 62-91 with the 30-character Common Record Document ID on all response records. If the school populates any data in positions 62-91 on the incoming record, COD will overwrite this data with the Document ID on the response record.

**Example**

N01 - Transmission Header
N05 - Transmission Batch Header
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e"
N95 - Transmission Batch Trailer
N05 - Transmission Batch Header
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e"
N95 - Transmission Batch Trailer
N99 - Transmission Trailer

**COD Message Classes**

For information on the message classes, please refer to *Volume II, Section 2 - COD Message Classes* in this technical reference.

**Logical Record Length Limitation**

For information and recommended solutions concerning the 32-kilobyte file length limitation on mainframe systems and the 9,999 byte limitation on the COD System, refer to the *Common Record Physical Record Layout* topic within *Volume II, Section 3 - Common Record Layout* in this technical reference.

**COD Receipts**

In March 2016, the COD system stopped generating and sending receipts for Common Record documents received via SAIG.
Response Documents

For all Common Records received and processed by the COD System, the COD System returns a Response document indicating the status of Common Record processing, including any rejected data elements and reason(s) for the rejection(s).

Business Rules

1. The COD System sends one Response document for each Common Record document processed by the COD System.

2. A Response complex element is generated for each major complex element reported on a Common Record document: Document, Reporting School, Attended School, Student, Award, and Disbursement.

3. All Response complex elements are nested within the Response document.

4. Schools have an option to receive a Full or Standard Response to Common Records processed by the COD System.
   a. A Full Response contains all the original tags sent by the School, the rejected data elements and reason codes, and additional calculations performed by COD during processing.
   b. A Standard Response contains the rejected data elements and reason codes and calculations performed by COD during processing.
   c. This option defaults to a Standard Response.

5. Schools can override this option on a record-by-record basis by submitting the <FullResponseCode> tag on the Common Record.
   a. If the <FullResponseCode> tag is not sent, the option defaults to Standard Response.

6. For Common Records transmitted via SAIG, the COD System sends Response Documents to the school’s SAIG mailbox.

7. For Common Records transmitted via the web, schools have an option to receive a response either via the web only, or via the web and their SAIG mailbox.
   a. Unless the school changes the web activity response option on the COD Web site’s School Options Page, the school will receive a response via the web only.
   b. A response via the web will only indicate whether the record was accepted or rejected and will not contain submitted data elements.

EDExpress Dates

Although EDExpress accepts any date on or after 10/01/2020, the valid 2021-2022 date range for disbursement records is from the date the 2021-2022 Pell schedules are posted on the Knowledge Center Web site (fsapartners.ed.gov/knowledge-center) to 09/30/2027.
c. Schools that do not wish to receive a response via the web must change this option for each program.

d. Schools that chose to receive a response for web activity via their SAIG mailbox will receive a Full Response.

<table>
<thead>
<tr>
<th>School will receive:</th>
<th>If the school sends the Common Record via:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SAIG Mailbox...</td>
</tr>
<tr>
<td>Response</td>
<td>Via SAIG Mailbox</td>
</tr>
</tbody>
</table>

**Example**

The following diagram illustrates how a Response complex element is generated for every complex element of data submitted on the Common Record and the nesting of those complex elements within the Response Document:

Common Record  
   Reporting School  
      Attended School  
         Student  
            Award  
                Award Response  
                   Disbursement  
                     Disbursement Response  
                        Student Response  
                           Attended School Response  
                              Reporting School Response  
                                 Common Record Response

**Response Code**

For each Response complex element returned, the COD System generates a Response Code that indicates whether the complex element was accepted, rejected, or corrected. The Response complex element and Response Code is returned for each major complex element: Reporting School, Attended School, Person, Award, and Disbursement.

**Business Rules**

1. The COD System returns a Response complex element with a Response Code of A (Accepted), R (Rejected), or C (Corrected).

2. A Response complex element with a Response Code of A (Accepted) is returned to indicate that the complex element was accepted.

3. A Response complex element with a Response Code of A (Accepted) may have a warning edit returned on the complex element.
4. A Response complex element with a Response Code of A (Accepted) does not exclude another complex element in the hierarchy from being accepted, corrected, or rejected.
   
a. If a Person complex element is Accepted, this does not exclude the possibility that the Award or Disbursement complex elements may be accepted, corrected, or rejected.
   
b. If an Award complex element is Accepted, this does not exclude the possibility that the Person or Disbursement complex elements may be accepted, corrected, or rejected.
   
5. A Response complex element with a Response Code of R (Rejected) is returned to indicate that the data elements in the complex element are rejected.
   
6. A Response complex element with a Response Code of R (Rejected) is returned with at least one reject edit.
   
7. A Response complex element with a Response Code of R (Rejected) can result in other complex elements being rejected.
   
a. On the initial submission of the Document, a Response Code of R (Rejected) is returned if the Common Record document does not meet the rules of the XML Common Record Schema.
   
b. On the initial submission of a Person, if a Person complex element is rejected, then the Award complex element is rejected, even if all data in the Award complex element passed the edits, because the COD System cannot accept an Award complex element without an established Person.
   
c. On the initial submission of a Person, if all Award complex elements in the submission are rejected, then the Person complex element is rejected, because the COD System cannot accept a Person complex element without at least one established Award.
   
d. On an initial submission of an Award, if an Award complex element is rejected, then the Disbursement complex element is rejected, even if all data in the Disbursement complex element passed the edits, because the COD System cannot accept the Disbursement complex element without an established Award.
   
8. Response complex element with a Response Code of C (Corrected) is returned only when at least one data element within the complex element has been corrected. Beginning in October 2016, the COD System will introduce correcting logic to Direct Loan processing for
all schools. The COD System will correct Pell Grant Award and Disbursement data for schools that choose to have their data corrected rather than rejected. A <ResponseCode> of C may be returned only in these complex elements:

a. A Response complex element with a Response Code of c (Corrected) does not preclude another complex element in the hierarchy from being accepted, corrected, or rejected.

b. If an Award complex element is corrected, this does not exclude the possibility that the Disbursement complex element may be accepted, corrected, or rejected.

c. If a Disbursement complex element is corrected, this does not exclude the possibility that the Award complex element may be accepted, corrected, or rejected.

**Example**

<table>
<thead>
<tr>
<th>Complex Element</th>
<th>Processed With Edits</th>
<th>Response Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person</td>
<td>No</td>
<td>A (Accepted)</td>
</tr>
<tr>
<td>Award (1)</td>
<td>No</td>
<td>A (Accepted)</td>
</tr>
<tr>
<td>Disbursement (for Award 1)</td>
<td>No</td>
<td>A (Accepted)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Complex Element</th>
<th>Processed With Edits</th>
<th>Response Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person</td>
<td>No</td>
<td>A (Accepted)</td>
</tr>
<tr>
<td>Award (1)</td>
<td>Yes (with corrections)</td>
<td>C (Corrected)</td>
</tr>
<tr>
<td>Disbursement (for Award 1)</td>
<td>No</td>
<td>A (Accepted)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Complex Element</th>
<th>Processed With Edits</th>
<th>Response Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person</td>
<td>No</td>
<td>R (Rejected)</td>
</tr>
<tr>
<td>Award (1)</td>
<td>Yes</td>
<td>R (Rejected)</td>
</tr>
<tr>
<td>Disbursement (for Award 1)</td>
<td>No</td>
<td>R (Rejected)</td>
</tr>
</tbody>
</table>

*Because no Awards were accepted*

*Because the Award was not accepted*
<table>
<thead>
<tr>
<th>Person</th>
<th>No</th>
<th>A (Accepted) Because at least one Award was accepted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award (1)</td>
<td>No</td>
<td>A (Accepted)</td>
</tr>
<tr>
<td>Award (2)</td>
<td>Yes</td>
<td>R (Rejected)</td>
</tr>
<tr>
<td>Disbursement (for Award 2)</td>
<td>No</td>
<td>R (Rejected) Because the Award was not accepted</td>
</tr>
</tbody>
</table>

**Storing of Reject Records**

The COD System does not store records that have rejected at the Document (Batch) and Entity level including XML validation failures. The COD System does store Document and Entity data from records that have been rejected at the Person, Award, or Disbursement level. Records that have rejected at the Person, Award, and/or Disbursement levels can be viewed on the COD Web site.

**Business Rules**

1. Schools may view their rejected records on the COD Web site.

2. Rejected records are not included in any COD Reports.

**Document Validation**

If a document does not validate against the XML Common Record Schema, the COD System does not process the document.

**Business Rules**

1. The COD System contains a validation program that ensures that the Common Record documents are well formed and properly structured.

2. The COD System process the Common Record Document using the XML schema version indicated by the Common Record tag.
   a. If tags are identified that are not specific to the XML schema version used for processing, the document is considered invalid and Customer Service is notified of the error. Customer Service works with the school to avoid future processing problems.

3. The COD System does not process a document if:
   a. The Document ID is missing or incomplete.

   OR

   b. The document structure does not meet the rules of the XML Common Record Schema.

   OR

For more information please refer to the Document ID Required for Document Submission, Sequence of Data Elements Required for Document Processing, and Document Submission topics of this Technical Reference.
c. More than one Common Record document is inserted between an SAIG Transmission Batch Header (O*N05) and Trailer (O*N95) pair.

4. When a Common Record is submitted with a missing or incomplete Document ID, the COD System cannot return a response to the sender.

5. When a Common Record document does not meet the rules of the XML Common Record Schema, the COD System will not return a response to the sender. However, an error response file will be returned to the sender containing reject edit 210. More information regarding the error response file can be found in the “Common Record XML Schema Guidelines” section of the Implementation Guide.

6. When more than one Common Record is inserted between an SAIG Transmission Batch Headers (O*N05) and Trailer (O*N95) pair, the COD System returns a Response with Reject Edit 105 and message.

**Sequence of Data Elements Required for Document Processing**

The sequence of data within the Common Record is dictated by the sequence of data elements presented in the XML Common Record Schema.

**Business Rules**

1. Data elements submitted by a school must occur in the same sequence as depicted in the XML Common Record Schema.

2. A Common Record submitted with data elements out of sequence will not validate against the XML Common Record Schema, and will therefore be rejected.

**Document ID Required for Document Submission**

The COD System checks to ensure the Document ID is present and is properly formatted.

**Business Rules**

1. Document ID is an essential element for importing, storing and tracking the data submitted in a Common Record Document by a school.

2. The COD System does not process documents that do not have a Document ID.

3. The COD System does not process documents that have an incomplete Document ID.

4. The COD System does not process documents that have an invalid Document ID format.
5. The Routing ID listed in the Document ID must be the same Routing ID as the Source Routing ID.

6. The COD System is unable to store a Common Record document that has an invalid, incomplete, or missing Document ID.

7. The COD System cannot return a response to a sender that submits an invalid, incomplete, or missing Document ID.

**Duplicate Document IDs**
The COD System checks the Document ID for duplicates on the COD database.

**Business Rules**
1. Document ID is defined as the DateTime stamp and the Source Routing ID.

2. A duplicate document is defined as a document that has a Document ID identical to one already established on the COD System.

3. The COD System rejects the document if the Document ID is a duplicate.

4. A rejected Document ID cannot be resubmitted as the COD System will recognize it as a duplicate.

5. The COD System generates a Response with Reject Edit 003 for documents with duplicate Document IDs. The Response does not contain detail data elements.

**Inability to Process Future-Dated Documents**
The COD System confirms that the date portion of the Document's Created DateTime is not greater than the System Date.

**Business Rules**
1. If the date portion of the Document's Created DateTime is greater than the System Date, the COD System rejects the document with Reject Edit 006.

2. The COD System generates a a Response for future-dated documents.

3. Schools located across the international dateline should resubmit documents rejected with Reject Edit 006.
Documents Submitted Must Contain at Least One Detailed Record

A detailed record consists of at least one Student Identifier and one Award. A Student Identifier consists of the student tag and three attributes: Social Security Number, Date of Birth, and Last Name.

Business Rules

1. The COD System rejects the document if it does not contain at least one detailed record.
   a. A detailed record on a New record is defined as at least one Student Identifier (Social Security Number, Date of Birth and Last Name) and one Award tag.
   b. A detailed record on an Update record is defined as at least one Student Identifier (Social Security Number, Date of Birth and Last Name) and one Award tag.

2. The COD System generates a Response with Reject Edit 007 for documents with no detailed records.

Document Submissions of One Detailed Record

The COD System is designed to process a large number of detailed records at one time when submitted together in a Common Record document. Standard school practice when submitting records is to submit a large quantity of records at once in one document. The design of the COD System incorporates this common school practice with its batch processing functionality.

Business Rules

1. The COD System will accept and process single detailed record documents, but the system is not designed to regularly process multiple Common Record document submissions of one record each.

2. Processing time increases with submission of multiple documents of one detailed record each.
   a. The time it takes the COD System to process a Common Record document is affected by the amount of time it takes to process the individual components of the document:
      i. The SAIG batch header and trailer
      ii. The records contained within the document
   b. The time it takes the COD System to process each record within a Common Record document is minimal in comparison to the time it takes the COD System to process the batch header and trailer.
   c. The processing time for the batch header and trailer does not vary with document size. The batch header
and trailer will be processed in the same amount of
time by the COD System for a document containing
one detailed record as for a document containing 50
records.

d. Processing time for multiple records submitted in
individual Common Record documents will take
significantly more time than it takes to process the
same number of records submitted together in one
Common Record document. For example, it will
take much longer for the COD System to process 50
documents of one record each than one document
containing 50 records.

3. Multiple document submissions each containing one
individual record will delay processing of all schools’
records submitted after the group of single record
documents.

4. The COD System will NOT reject document submissions
containing only one record.

5. Document submissions containing only one record should
be submitted on an exception basis only.

6. The COD Web site is designed to accommodate record
submission on a record-by-record basis. Schools may
submit multiple individual records to the COD System
via the COD Web site without experiencing processing
delays.

**Document Submissions of Multiple Detailed Records**

The COD System is designed to process a large number of detailed
records at one time when submitted together in a Common Record
document. Standard school practice when submitting records is to submit
a large quantity of records at once in one document. The design of the
COD System incorporates this common school practice with its batch
processing functionality.

**Business Rules**

1. The COD System will NOT reject document submissions containing
multiple records.

2. Batches containing greater than 50,000 records may not be viewable
via the COD Web site.

3. Prior to sending a batch with multiple records to COD, ensure that
your system will be able to import the common record response
containing multiple records.
Minimum Data Elements Required for Document Processing

The COD System requires certain data elements for processing each complex element of the document. Depending on the scenario, different minimum data elements may be required for document processing.

The bolded fields below are generic examples for the actual value used to replace “source.” For more information, refer to Volume 2, Section 3 - Common Record Layout.

Business Rules

1. The following data elements are required for processing a change to Student demographic data for a Pell or TEACH Grant Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
>TotalCount>
<AttendedSchool>
<RoutingID>
<Student>
[Index>
<SSN>
<BirthDate>
<LastName>
<Pell> (Pell only)
<TEACH> (TEACH Grant only)
<FinancialAwardYear>
<FinancialAwardNumber> (TEACH grant only)
<FinancialAwardID> (TEACH grant only)
<ProgramCIPCodeYear>
```

2. The following data elements are required for processing a change to Student demographic data for a Direct Loan Subsidized or Unsubsidized Award:

```xml
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
```

Required Tags

For the Direct Loan Program, COD will return edit 996 if tags are not submitted in the correct block, per the award year.
3. The following data elements are required for processing a change to Student demographic data for a Direct PLUS Loan (parent borrower and graduate/professional student borrower) Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
>TotalCount>
<AttendedSchool>
<RoutingID>
<Student>
<Index>
<SSN>
<BirthDate>
<LastName>
<DLSubsidized> or <DLUnsubsidized>
<FinancialAwardYear>
<FinancialAwardNumber>
<FinancialAwardID>
<ProgramCIPCodeYear>
```
a. The following data elements are required in addition to the minimum required tags for a new credit check on an origination for domestic addresses:

<Last Name>  <ProgramCIPCodeYear>

<BorrowerSSN>  <BorrowerLastName>  <BorrowerDOB>  <Addressline>  <City>  <StateProvinceCode>  <PostalCode>  <ProgramCIPCodeYear>

b. The following data elements are required in addition to the minimum required tags for a new credit check on an origination for foreign addresses:

<BorrowerSSN>  <BorrowerLastName>  <BorrowerDOB>  <Addressline>  <City>  <Country>  <ProgramCIPCodeYear>

4. The following data elements are required for processing a Direct Loan Subsidized or Unsubsidized Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<TransmissionData>
<DocumentID>
<CreatedAtTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<ReportingSchool>
</RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
<FinancialAwardYear>
>TotalCount>
>TotalReportedAward
>TotalReportedDisbursement>
<AttendedSchool>
<RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<Student>
<Index>
<SSN>
<BirthDate>
<LastName>
```
5. The following data elements are required for processing a Direct PLUS Loan (parent borrower and graduate/professional student borrower) Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<Software>
```
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
<FinancialAwardYear>
>TotalCount>
>TotalReportedAward>
>TotalReportedDisbursement>
<AttendedSchool>
<RoutingID>
<Student>
[Index>
<SSN>
<BirthDate>
<LastName>
<DLLoanInformation AwardKey="">
<OriginationFeePercent>
<InterestRebatePercent>
<StudentLevelCode>
<FinancialAwardBeginDate>
<FinancialAwardEndDate>
<AcademicYearBeginDate>
<AcademicYearEndDate>
<DLPLUS>
<AwardKey>
<FinancialAwardYear>
<FinancialAwardAmount>
<DependencyStatusCode>
<DefaultOverpayCode>
<FinancialAwardNumber>
<FinancialAwardID>
<FinancialAwardCreateDate>
<FinancialAwardAmountRequested>
<StudentEligibilityCode>
<Borrower>
[Index>
<SSN>
<BirthDate>
<LastName>
<PersonIdentifiers>
<FirstName>
<Contacts>
(Required only if address tags are included)
*<PermanentAddress> or <TemporaryAddress>
(Required only if address tags are included)
*<AddressLine>
*<City>
*<StateProvinceCode> (Address is domestic)
*<PostalCode> (Address is international)
*<CountryCode>
<Citizenship>
<CitizenshipStatusCode> (This tag is for student and borrower)
<DefaultOverpayCode>
<Disbursement>
<Disbursement Number="">
<DisbursementAmount>
<DisbursementDate>
<DisbursementReleaseIndicator>
<DisbursementSequenceNumber>
<EnrollmentSchoolCode>
<PaymentPeriodStartDate>
<EnrollmentStatus>
<ProgramCIPCode>
<ProgramCIPCodeYear>
<PublishedPgmLengthYears>
6. The following data elements are required for processing a change to a Direct Loan (Subsidized, Unsubsidized, or PLUS) Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
 xmlns:xsd="http://www.w3.org/2001/XMLSchema"
 xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
 xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e"
 xmlns:http="http://www.ed.gov/FSA/COD/2020/v4.0e"
 xmlns:TransmissionData="common" xmlns:DocumentID="common"
 xmlns:RoutingID="common" xmlns:Software="common"
 xmlns:SoftwareProvider="common"
 xmlns:SoftwareVersion="common"
 xmlns:ReportingSchool="common"
 xmlns:ReportedFinancialSummary="common"
 xmlns:FinancialAwardType="common"
 xmlns:FinancialAwardYear="common"
 xmlns:TotalCount="common"
 xmlns:TotalReportedAward="common"
 xmlns:TotalReportedDisbursement="common"
 xmlns:AttendedSchool="common"
 xmlns:Student="common"
 xmlns:Index="common"
 xmlns:SSN="common"
 xmlns:BirthDate="common"
 xmlns:LastName="common"
 xmlns:DLSubsidized="common"
 xmlns:DLUnsubsidized="common"
 xmlns:DLPLUS="common"
 xmlns:FinancialAwardYear="common"
 xmlns:FinancialAwardAmount="common"
 xmlns:FinancialAwardNumber="common"
 xmlns:FinancialAwardID="common"
 xmlns:Borrower="common"
 xmlns:index="common"
 xmlns:SSN="common"
 xmlns:BirthDate="common"
 xmlns:LastName="common"
 xmlns:Disbursement="common"
 xmlns:DisbursementNumber="#"
 xmlns:DisbursementAmount="common"
 xmlns:DisbursementDate="common"
 xmlns:DisbursementReleaseIndicator="common"
 xmlns:DisbursementSequenceNumber="common"
 xmlns:EnrollmentSchoolCode="common"
 xmlns:PaymentPeriodStartDate="common"
 xmlns:EnrollmentStatus="common"
 xmlns:ProgramCIPCode="common">
```

7. The following data elements are required for processing a Direct Loan anticipated disbursement (Disbursement Release Indicator set to false):

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmni:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
<FinancialAwardYear>
>TotalCount>
>TotalReportedAward>
>TotalReportedDisbursement>
<AttendedSchool>
<RoutingID>
<Student>
[Index>
<SSN>
<BirthDate>
<LastName>
<DLSubsidized> or <DLUnsubsidized> or <DLPLUS>
<FinancialAwardYear>
<FinancialAwardNumber>
<FinancialAwardID>
<Borrower> (PLUS only)
[Index>
<SSN>
<BirthDate>
<LastName>
<Disbursement>
<Disbursement Number=""
<DisbursementAmount>
<DisbursementDate>
<DisbursementReleaseIndicator>
<DisbursementSequenceNumber>
<EnrollmentSchoolCode>
<PaymentPeriodStartDate>
<EnrollmentStatus>
<ProgramCIPCode>
<ProgramCIPCodeYear>
<PublishedPgmLengthYears>
```
8. The following data elements are required for processing a Direct Loan actual disbursement (Disbursement Release Indicator set to true):

```xml
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
</Source>
<RoutingID>
<Destination>
</RoutingID>
</RoutingID>
</RoutingID>
</RoutingID>
</RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
</ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
<FinancialAwardYear>
>TotalCount>
>TotalReportedAward>
>TotalReportedDisbursement>
<AttendedSchool>
</RoutingID>
</RoutingID>
</RoutingID>
</RoutingID>
</RoutingID>
</RoutingID>
</RoutingID>
<Disbursement>
<DisbursementNumber=""
<DisbursementAmount>
<DisbursementDate>
<DisbursementReleaseIndicator>
<DisbursementSequenceNumber>
<EnrollmentSchoolCode>
</EnrollmentStatus>
<ProgramCIPCode>
</ProgramCIPCodeYear>
</PublishedPgmLengthYears>
</SpecialPrograms>
</ProgramCredentialLevel>
```
9. The following data elements are required for processing a Pell Grant Award:

```xml
<<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xlns:code="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
>TotalCount>
>TotalReportedAward>
<AttendedSchool>
<RoutingID>
<Student>
[Index>
<SSN>
<BirthDate>
<LastName>
<Contacts> (Required only if address tags are included)
<PermanentAddress> or <TemporaryAddress> (Required only if address tags are included)
<AddressLine>
<City>
<StateProvinceCode> (Address is domestic)
<PostalCode> (Address is international)
<CountryCode>
<Pell>
<FinancialAwardYear>
<CPSTransactionNumber>
<FinancialAwardAmount>
<AttendanceCost>
<EnrollmentDate>
<StudentEligibilityCode>
<VerificationStatusCode>
<ProgramCIPCodeYear>
</CommonRecord>
</TransmissionData>
```

10. The following data elements are required for processing a change to a Pell Grant Award:

```xml
<<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xlns:code="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
```
11. The following data elements are required for processing a Pell Grant anticipated disbursement (Disbursement Release Indicator set to false):

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
</Source>
</RoutingID>
<Destination>
</RoutingID>
</Software>
</SoftwareProvider>
</SoftwareVersion>
</ReportingSchool>
</RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
>TotalCount>
>TotalReportedAward>
<AttendedSchool>
</RoutingID>
<Student>
</Index>
</SSN>
</BirthDate>
</LastName>
</Pell>
</FinancialAwardYear>
</FinancialAwardAmount>
</PaymentPeriodStartDate>
</ProgramCIPCodeYear>
(Required only if there was a period of ineligibility at the school)
```
12. The following data elements are required for processing a Pell Grant actual disbursement (Disbursement Release Indicator set to true):

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <DocumentID>
      <CreatedDateTime>
        <Source>
          <RoutingID>
            <Destination>
              <RoutingID>
                <Software>
                  <SoftwareProvider>
                    <SoftwareVersion>
                      <ReportingSchool>
                        <RoutingID>
                          <ReportedFinancialSummary>
                            <FinancialAwardType>
                              <TotalCount>
                                <TotalReportedAward>
                                  <TotalReportedDisbursement>
                                    <AttendedSchool>
                                      <RoutingID>
                                        <Student>
                                          <Index>
                                            <SSN>
                                              <BirthDate>
                                                <LastName>
                                                  <Pell>
                                                      <FinancialAwardYear>
                                                          <CPSTransactionNumber>
                                                              <FinancialAwardAmount>
                                                                  <AttendanceCost>
                                                                      <Disbursement>
                                                                          <Disbursement Number="">
                                                                            <DisbursementAmount>
                                                                                <DisbursementDate>
                                                                                    <DisbursementReleaseIndicator>
                                                                                        <DisbursementSequenceNumber>
                                                                                            <EnrollmentSchoolCode>
                                                                                                <PaymentPeriodStartDate> (Required only if school is ineligible)
                                                                                                    <EnrollmentStatus>
                                                                                      <ProgramCIPCode>
                                                                                      <ProgramCIPCodeYear>
                                                                                      <PublishedPgmLengthYears>
                                                                                      <SpecialPrograms>
                                                                                      <ProgramCredentialLevel>
```
13. The following data elements are required for processing a TEACH Grant Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <DocumentID>
      <CreatedDateTime>
        <Source>
          <RoutingID>
            <Destination>
              <RoutingID>
                <Software>
                  <SoftwareProvider>
                    <SoftwareVersion>
                      <ReportingSchool>
                        <RoutingID>
                          <ReportedFinancialSummary>
                            <FinancialAwardType>
                              <TotalCount>
                                <TotalReportedAward>
                                  <AttendedSchool>
                                    <RoutingID>
                                      <Student>
                                        <Index>
                                          <SSN>
                                            <BirthDate>
                                              <LastName>
                                                <Contacts> (Required only if address tags are included)
                                                  *<PermanentAddress> or <TemporaryAddress> (Required only if address tags are included)
                                                    *<AddressLine>
                                                      *<City>
                                                        *<StateProvinceCode> (Address is domestic)
                                                        *<PostalCode>
                                                          *<CountryCode> (Address is international)
                                                    <FinancialAwardYear>
                                                      <CPSTransactionNumber>
                                                        <FinancialAwardAmount>
                                                          <FinancialAwardNumber>
                                                            <FinancialAwardID>
                                                              <EnrollmentDate>
                                                                <StudentEligibilityCode>
                                                                  <Disbursement>
                                                                    <Disbursement Number="">
                                                                      <DisbursementAmount>
                                                                        <DisbursementDate>
                                                                          <DisbursementReleaseIndicator>
                                                                            <DisbursementSequenceNumber>
                                                                              <EnrollmentSchoolCode>
                                                                                <PaymentPeriodStartDate>(Required only if school is ineligible)
                                                                              <EnrollmentStatus>
```
14. The following data elements are required for processing a change to a TEACH Grant Award:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmnc:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<DocumentID>
<CreatedDateTime>
<Source>
<RoutingID>
<Destination>
<RoutingID>
<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
>TotalCount>
>TotalReportedAward>
>TotalReportedDisbursement>
<AttendedSchool>
<RoutingID>
<Student>
[Index>
<SSN>
<BirthDate>
<LastName>
<TEACH>
<FinancialAwardYear>
<CPSTransactionNumber>
<FinancialAwardAmount>
<FinancialAwardNumber>
<FinancialAwardID>
<Disbursement>
<Disbursement Number=""/>
<DisbursementAmount>
<DisbursementDate>
<DisbursementReleaseIndicator>
<DisbursementSequenceNumber>
<EnrollmentSchoolCode>
<PaymentPeriodStartDate>(Required only if school is ineligible)
<EnrollmentStatus>
<ProgramCIPCode>
</ProgramCIPCodeYear>
<PublishedPgmLengthYears>
<SpecialPrograms>
<ProgramCredentialLevel>
```

15. The following data elements are required for processing a TEACH Grant anticipated disbursement (Disbursement Release Indicator set to false):
16. The following data elements are required for processing a TEACH Grant actual disbursement (Disbursement Release Indicator set to true):

```xml
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
    xmlns:xsd="http://www.w3.org/2001/XMLSchema"
    xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
    xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <DocumentID>
      <CreatedDateTime>
        <Source>
          <RoutingID>
            <Destination>
              <RoutingID>
                <Software>
                  <SoftwareProvider>
                    <SoftwareVersion>
                      <ReportingSchool>
                        <RoutingID>
                          <ReportedFinancialSummary>
                            <FinancialAwardType>
                              <TotalCount>
                                <TotalReportedAward>
                                  <TotalReportedDisbursement>
                                    <AttendedSchool>
                                      <RoutingID>
                                        <Student>
                                          <Index>
                                            <SSN>
                                              <BirthDate>
                                                <LastName>
                                                    <TEACH>
                                                      <FinancialAwardYear>
                                                        <FinancialAwardNumber>
                                                          <FinancialAwardID>
                                                            <CPSSTransactionNumber>
                                                              <FinancialAwardAmount>
                                                                <Disbursement>
                                                                  <DisbursementNumber=""/>
                                                                  <DisbursementAmount>
                                                                    <DisbursementDate>
                                                                      <DisbursementReleaseIndicator>
                                                                        <DisbursementSequenceNumber>
                                                                          <EnrollmentSchoolCode>
                                                                            <PaymentPeriodStartDate> (Required only if school is ineligible)
                                                                              <EnrollmentStatus>
                                                                                <ProgramCIPCode>
                                                                                  <ProgramCIPCodeYear>
                                                                                    <PublishedPgmLengthYears>
                                                                                      <SpecialPrograms>
                                                                                      <ProgramCredentialLevel>
```

<Software>
<SoftwareProvider>
<SoftwareVersion>
<ReportingSchool>
<RoutingID>
<ReportedFinancialSummary>
<FinancialAwardType>
>TotalCount>
>TotalReportedAward>
>TotalReportedDisbursement>
<AttendedSchool>
<RoutingID>
<Student>
/Index>
<SSN>
/BirthDate>
/LastName>
/TEACH>
<FinancialAwardYear>
<FinancialAwardNumber>
<FinancialAwardID>
<CPSTransactionNumber>
<FinancialAwardAmount>
<Disbursement>
<Disbursement Number="">"">
<DisbursementAmount>
<DisbursementDate>
<DisbursementReleaseIndicator>
<DisbursementSequenceNumber>
<EnrollmentSchoolCode>
<PaymentPeriodStartDate>(Required only if school is ineligible)
<EnrollmentStatus>
<ProgramCIPCode>
<ProgramCIPCodeYear>
<PublishedPgmLengthYears>
<SpecialPrograms>

Common School Identifier
In 2003-2004, the Common School Identifier became known as the Routing ID.

Routing ID
The Routing ID is an identifier assigned to Schools and Third-Party Servicers that is common across the Pell Grant, TEACH Grant and Direct Loan programs.

Business Rules
1. The Routing ID is nested in the Entity complex elements (for example, School, COD, Reporting School, Attended School) on the Common Record and serves as a routing number for COD.

2. The Routing ID is a randomly generated eight-character, numeric key. The values in the key do not signify any information about the numbered entity except its identity.

3. Routing IDs are assigned to all post-secondary Schools, Third-Party Servicers, the COD System, and work in conjunction with the Pell Institution Number and Direct Loan (E/G) School code.

4. The Routing ID can be viewed on the COD Web site by accessing the School Summary page. On the COD Web site, the Routing ID is titled the COD ID.
**Entity ID**

A valid Routing ID is required in the Source, Destination, Reporting School, and Attended School complex elements.

**Business Rules**

1. A valid Routing ID must be reported in the `<RoutingID>` tag nested within the following Entity complex elements:
   a. Source, `<Source>`
   b. Destination, `<Destination>`
   c. Reporting School, `<ReportingSchool>`
   d. Attended School, `<AttendedSchool>`
   e. A valid Routing ID is the Routing ID for the school or Third-Party Servicer.

2. The Source Routing ID is the physical sender of the document.
   a. The Source Routing ID must be the same Routing ID listed in the Document ID.
   b. The Source Routing ID can be a school or Third-Party Servicer.
   c. Since the Source Entity sends the Common Record document to COD, the TG Destination Number that the Source Entity reported in the SAIG Transmission Header and Trailer is more than likely for the same entity.

3. The Destination Routing ID is the destination or recipient of the document.
   a. If a School sends the document to the COD System, the Destination Routing ID is “00000001” for COD.
   b. If the document is sent from the COD System back to the Source, the Destination Routing ID is equal to the Source Routing ID on the original transmission.
   c. The response file is sent to the TG Number reported in the Transmission Header and Trailer. System generated response file is sent by COD to the TG Number for the school who has reporting relation with the attended school for the award being responded.

4. The Reporting School Routing ID is the school that sends and receives data for the campuses or students it serves.
   a. The Reporting School Routing ID must be a school and cannot be a Third-Party Servicer.
b. The Reporting School Routing ID does not have to be equal to the Source Routing ID, but must have a relationship with the Source Entity and the TG Destination Number.

5. The Attended School Routing ID is the school or campus where the student attends class if that location has its own Pell Grant or Direct Loan code.
   a. Attended School Routing ID must be equal to the Reporting School Routing ID, OR
   b. Attended School Routing ID must have an established relationship to the Reporting School Routing ID.
   c. If the school or campus where the student attends class is not separately eligible, the Reporting School Routing ID must be reported in the Attended School Routing ID tag.

6. Multiple Reporting School Routing IDs and Attended School Routing IDs can be submitted in the same Common Record.

7. The COD System checks the Source Routing ID against the COD database and rejects the document if the Routing ID cannot be found or is invalid.

8. When the Source Routing ID cannot be found, the COD System generates a Response with error code 004.

9. When the Source Routing ID is invalid, the COD System generates a Response with error code 001.

Currently, if a school has separate TG numbers for Pell and Direct Loan and wishes to report both Pell and Direct Loan in one Common Record, the school must contact SAIG to complete paperwork to have one TG Number (schools may select which number they want to use) that reports both Pell and Direct Loan. This does NOT mean that every Common Record must have both Pell and Direct Loan information. It simply means the school would like the option of sending both Pell and Direct Loan in the same Common Record document. The school can also continue processing Pell and Direct Loan information by sending separate Common Record documents for each program using separate TG numbers.

**Example 1**

In this first example, a Common Record is submitted for Pell and Direct Loan programs for multiple schools using one TG Number for the SAIG Transmission Batch Header. The Reporting entity is sending the Common Record and is reporting awards for two other schools that are both separately eligible.
School A

- Reports for two additional locations – School B and School C. Therefore, this Routing ID is nested in the Reporting School complex element.

- Sends the Common Record to COD. Therefore, School A Routing ID is nested in the Source Entity complex element and the Document ID.

- TG # = 99991. This TG # is used in the SAIG Transmission Batch Header and Trailer.

- Routing ID = 11111111

School B

- Has an Attended relationship with School A. This Routing ID is nested in the Attended School complex element tag.

- TG # is not applicable because School A sends the Common Record.

- Routing ID = 22222222

School C

- Has an Attended relationship with School A. This Routing ID is nested in the Attended School complex element tag.

- TG # is not applicable because School A sends the Common Record.

- Routing ID = 33333333

```
SAIG Transmission Header Record
SAIG Transmission Batch Header Record (Header Destination # - TG #99991)
<?xml version="1.0" encoding="UTF-8"?>
<TransmissionData>
  <CreatedDateTime>2019-08-29T09:09:09.00</CreatedDateTime>
  <Source>
    <School>
      <RoutingID>11111111</RoutingID>
    </School>
  </Source>
  <Destination>
    <COD>
      <RoutingID>00000001</RoutingID>
    </COD>
  </Destination>
</TransmissionData>
```
A Common Record is submitted for Pell and Direct Loan programs for multiple schools using one TG Number for the SAIG Transmission Batch Header. A Third-Party Servicer is sending the records for multiple schools.

**Third-Party Servicer**

- Sends the Common Record to COD for Schools D and E. Therefore, the Third-Party Servicer Routing ID is nested in the Source complex element and the Document ID.
  - TG # = 88888. This TG # is used in the SAIG Transmission Batch Header and Trailer.
- Routing ID = 44444444

**School D**

- Uses a Third-Party Servicer to send records to COD; however, does its own reporting for students that attend its campus. School D Routing ID is nested in the Reporting School complex element and Attended School complex element.
- The TG # is not applicable because the Third-Party Servicer sends the Common Record.
- Routing ID = 55555555

**School E**

- Uses a Third-Party Servicer to send records to COD; however, does its own reporting for students that attend its campus. School E Routing ID is nested in the Reporting School complex element and Attended School complex element.
- TG # is not applicable because the Third-Party Servicer sends the Common Record.
- Routing ID = 66666666

```
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <CreatedDateTime>2019-08-29T09:09:09.00</CreatedDateTime>
    <Source>
      <ThirdPartyServicer>
        <RoutingID>44444444</RoutingID>
      </ThirdPartyServicer>
    </Source>
    <Destination>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Destination>
    <Software>
      <SoftwareProvider>mite</SoftwareProvider>
      <SoftwareVersion>2.0</SoftwareVersion>
    </Software>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>55555555</RoutingID>
    <AttendedSchool>
      <RoutingID>55555555</RoutingID>
      <Student>
        <Index>
          <SSN>123456789</SSN>
          <BirthDate>1987-01-01</BirthDate>
          <LastName>SMITH</LastName>
        </Index>
      </Student>
      <Student>
        <Index>
          <SSN>987654321</SSN>
        </Index>
      </Student>
    </AttendedSchool>
  </ReportingSchool>
</CommonRecord>
```
Example 3

A Common Record is submitted for the Pell and Direct Loan programs for multiple schools. The Reporting entity is sending the Common Record and is reporting awards for one other school in which ONE of its locations does not have its own Pell or Direct Loan ID.

School F

- Reports for one additional location – School G. Therefore, this Routing ID is nested in the Reporting School complex element.
- Sends the Common Record to COD. Therefore, this Routing ID is used in the Source complex element and the Document ID.
- TG # = 33331. This TG # is used in the SAIG Transmission Batch Header and Trailer.
- Routing ID = 77777777

School G

- School G is an additional location of School F; however, this location does not have its own unique Pell grant or Direct Loan ID. Therefore, its Routing ID is not used in the Entity ID element.
- TG # is not applicable because School F sends the Common Record.
Routing ID = 88888888

Total Count in the Reported Financial Summary Complex Element

The COD System verifies that the Total Number of Students Tags by Award Type and Award Year, `<TotalCount>`, reported in the Reported Financial Summary complex element equals the total number of student tags by award type and award year in the document.

Business Rules
The COD System compares the Total Number of Students Tags by award type and award year, `<TotalCount>`, reported against the actual total number of student tags by award type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), by award year, and by Reporting School Routing ID in the document.

1. The COD System determines the actual total number of student tags by award type and award year in the Document by counting the number of Student Identifiers (SSN, Date of Birth and Last Name) for each award type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), award year, and Reporting School Routing ID in the document.

2. The COD System sends Warning Edit 008 if the reported `<TotalCount>` and the actual number of student tags by award type and award year are not identical. The warning does not prevent the document from being processed by the COD System.

3. The Total Number of Students reported may be a duplicated count. In the event that identical Student Identifiers are reported multiple times within a document for multiple award types or award years, the COD System counts them multiple times.

4. The Total Number of Students is reported by award year, by Award Type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), and by Reporting School Routing ID.

**Example 1**
In the following example, a Common Record is submitted for a student (SSN=123456789, BirthDate="1974-01-01", LastName="SMITH") containing one DL Subsidized and one Pell award. Since the `<TotalCount>` is not an unduplicated count of student tags, the student tag is counted twice in the Reported Financial Summary block, once for each award type and award year.

```
<ReportingSchool>
  <RoutingID>00123400</RoutingID>
  <ReportedFinancialSummary>
    <FinancialAwardType>DLSubsidized</FinancialAwardType>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <TotalCount>1</TotalCount>
    <TotalReportedAmount>2000</TotalReportedAmount>
    <TotalReportedDisbursement>1970</TotalReportedDisbursement>
  </ReportedFinancialSummary>
  <ReportedFinancialSummary>
    <FinancialAwardType>Pell</FinancialAwardType>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <TotalCount>1</TotalCount>
    <TotalReportedAward>3700</TotalReportedAward>
    <TotalReportedDisbursement>3700</TotalReportedDisbursement>
  </ReportedFinancialSummary>
</ReportingSchool>
```
Total Award Amount Reported in the Reported Financial Summary Complex Element

The COD System verifies that the Total Award Amount reported in the Reported Financial Summary complex element equals the actual total of all Award Amounts contained in the document.

Business Rules

1. The COD System compares the Total Award Amount Reported, `<TotalReportedAward>`, against the actual total of all Award Amounts contained in the document.

2. The COD System determines the actual total of all Award Amounts by adding the values of all the Award Amount tags in the document.

3. The COD System sends a warning with error code 102 if the Total Award Amount Reported and the actual total of all Award Amounts are not equal. The warning does not prevent the document from being processed by the COD System.

4. The Total Award Amount must be reported by award year, by Award Type (Pell, DL Subsidized, DL Unsubsidized, and DL PLUS), and by Reporting School Routing ID.

Example

```xml
<ReportingSchool>
  <RoutingID>00123400</RoutingID>
  <ReportedFinancialSummary>
    <FinancialAwardType>DLSubsidized</FinancialAwardType>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <TotalCount>1</TotalCount>
    <TotalReportedAmount>2000</TotalReportedAmount>
    <TotalReportedDisbursement>1970</TotalReportedDisbursement>
  </ReportedFinancialSummary>
  <ReportedFinancialSummary>
    <FinancialAwardType>Pell</FinancialAwardType>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <TotalCount>1</TotalCount>
    <TotalReportedAward>3700</TotalReportedAward>
    <TotalReportedDisbursement>3700</TotalReportedDisbursement>
  </ReportedFinancialSummary>
</ReportingSchool>
```

Total Disbursement Amount Reported in the Reported Financial Summary Complex Element

The COD System verifies that the Total Disbursement Amount Reported in the Reported Financial Summary complex element equals the actual total of all Disbursement Amounts contained in the document.

Business Rules

1. The COD System compares the Total Disbursement Amount Reported, `<TotalReportedDisbursement>`
against the actual total of all Disbursement Amounts contained in the document.

2. The COD System determines the actual total of all Disbursement Amounts by adding the values of the Disbursement Amount (gross) fields, regardless of whether the Disbursement Release Indicator is true or false, in the document.

3. The COD System sends a warning with error code 090 if the Total Disbursement Amount Reported and the actual total of all Disbursement Amounts are not equal. The warning does not prevent the document from being processed by the COD System.

4. The Total Disbursement Amount Reported must be reported by award year, by Award Type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), and by Reporting School Routing ID.

Example

```
<ReportingSchool>
  <RoutingID>00123400</RoutingID>
  <ReportedFinancialSummary>
    <FinancialAwardType>DLSubsidized</FinancialAwardType>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <TotalCount>1</TotalCount>
    <TotalReportedAmount>2000</TotalReportedAmount>
    <TotalReportedDisbursement>1970</TotalReportedDisbursement>
  </ReportedFinancialSummary>
  <ReportedFinancialSummary>
    <FinancialAwardType>Pell</FinancialAwardType>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <TotalCount>1</TotalCount>
    <TotalReportedAward>3700</TotalReportedAward>
    <TotalReportedDisbursement>3700</TotalReportedDisbursement>
  </ReportedFinancialSummary>
</ReportingSchool>
```

**Person Identifier**

The COD Person Identifier is composed of the student’s current Social Security Number, current Date of Birth, and current Last Name.

The person’s identifier is submitted in the Student Identifier tag or the Borrower Identifier tag based upon the person’s role in relationship to the incoming award. The Student Identifier is a required data element for all award types, must be included in all submissions of the Common Record and is matched against CPS data in most cases (see *Student Identifier and Data Elements Matched against the CPS*). The Borrower Identifier is a required data element only when submitting PLUS loans for graduate/professional students and parents of dependent undergraduate students and isn’t matched against CPS data.

**Business Rules**

1. The Student and Borrower Identifier are located in the Person complex element of the Common Record and are reported by the school.
2. A person’s identifier consists of the <Student> or <Borrower> tag and three attributes: the person’s current Social Security Number, current Date of Birth, and current Last Name.

   a. The Social Security Number (SSN) portion of the Person Identifier must contain nine digits.
   
   b. The SSN portion of the Person Identifier must be within the range of 001-01-0001 to 999-99-9998.
   
   c. The SSN portion of the Person Identifier may or may not contain hyphens after the third and fifth digits.
   
   d. The Date of Birth (DOB) portion of the Person Identifier must be in the CCYY-MM-DD format.
   
   e. The DOB portion of the Person Identifier must be greater than 1922-01-01 and less than 2013-12-31.
   
   f. The Last Name portion of the Person Identifier may consist of upper case letters A-Z, spaces, period, apostrophe, and dash.
   
   g. The Last Name portion of the Person Identifier may be blank.

3. All three Person Identifier attributes are required for processing by the COD System.

4. The COD system stores one set of Person Identifiers for each person. Person identifiers are not stored by award. COD uses the <Student> or <Borrower> tag to determine the person’s relationship to the incoming award (student or PLUS borrower).

5. Changes to a person’s identifier data elements must be submitted in the Social Security Number, Date of Birth, and/or Last Name simple element tags and not in <Student> or <Borrower> tag. Changes in the Person Identifier tag will not be recognized by the COD system.

On the first submission for a person for a new award year, it is recommended that the school submit the Person Identifier data elements in both the <Person> Complex Element and the <SSN>, <Last Name>, and <Date of Birth> simple elements. In some cases, unbeknownst to the school submitting the record, the person already exists on COD with different Person Identifier data (usually a different Last Name) due to activity at another school for a previous award year.

By submitting the <SSN>, <Last Name>, and <Date of Birth> simple elements, the school will trigger COD to attempt to change the person’s identifier data. If a change is made, all schools with records for that person will receive an SSN/Name/Date of Birth Change Report.
In cases where the simple elements are not submitted, the school’s award record may still accept (assuming it passes the CPS match, if appropriate, and all other applicable edits), but the Person Identifier data stored on COD will not be updated since COD does not recognize Person Identifier changes submitted in the Person Identifier tags. The previous Person Identifier data will appear in all COD system generated transactions and reports until the simple elements are submitted.

Alternatively, schools may use the COD Web site to search person data by SSN to confirm that the Person Identifier data on COD matches the Person Identifier data on their systems and determine if a Person Identifier change is necessary. Schools may also submit Person Identifier changes through the COD Web site if their software does not permit the submission of the `<SSN>`, `<Last Name>`, and `<Date of Birth>` simple elements.

6. Regardless of whether the changed simple element is accepted or rejected by the COD System, the person’s old identifier is returned in the Response.

7. If the changed simple element is accepted, the school must submit the new Person Identifier combination in future transmissions.

8. If the changed simple element is rejected, the person’s old identifier combination must be used in future transmissions.

9. The COD system stores the previously submitted Social Security Number for query purposes.

10. If the `<SSN>`, `<Last Name>`, and `<Date of Birth>` simple element is submitted with the same value that is listed in the attribute on the COD system, no update takes place.

**PLUS Rules Applied to All Award Types**

Since PLUS borrowers may also be students, the following rules apply if the person is a PLUS borrower and may be applied to any award type:

1. For Direct PLUS Loan Borrowers (either parent or graduate student), their SSN is used to perform the PLUS credit check. Attempts to change the SSN for a PLUS Borrower (for any award type) will be rejected with Reject Edit 121 if the following conditions exist:

   a. PLUS award is greater than zero

   AND

   b. The sum of all actual disbursements for the PLUS loan doesn’t equal the PLUS award amount (PLUS award isn’t fully disbursed).

2. Schools can change the SSN for a PLUS Borrower if the PLUS award amount has been fully disbursed for at least 24 hours or the PLUS loan is inactive. Therefore, to
change a PLUS Borrower’s SSN, the school must do one of the following:

a. If no actual disbursements have been reported, reduce the loan to zero and originate a new loan with the correct SSN.

b. If at least one actual disbursement has been reported, reduce the loan to the disbursed amount and originate a new loan for the balance of eligibility with the corrected SSN.

3. If a Date of Birth Change for a student whose parent has a PLUS loan (Parent PLUS) results in the parent and student Dates of Birth being the same, COD will reject the change with Edit 149. This applies to all award types (Pell, TEACH Grant, Sub, Unsub, PLUS).

4. If a SSN Change for a student whose parent has a PLUS loan (Parent PLUS) results in the parent and student SSNs being the same, COD will reject the change with Edit 152 whether the change is submitted on an initial submission of a loan or an award change record. This applies to all award types (Pell, TEACH Grant, Sub, Unsub, PLUS).

5. If a SSN change for a parent who has a PLUS loan (Parent PLUS) results in the parent and student SSNs being the same, COD will reject the change with Edit 153 whether the change is submitted on an initial submission of a loan or an award change record. This applies to all award types (Pell, TEACH Grant, Sub, Unsub, PLUS).

**PLUS Rules Applied to only PLUS Awards**

The following rules apply only to PLUS Loan submissions for both initial submissions and changes:

1. The COD system will allow Last Name or Date of Birth Person Identifier changes to be submitted at either the student or borrower level.

2. If the same SSN is submitted within the student and borrower identifier tags (Grad PLUS), the following elements within the student and borrower tags must also be the same.
   a. Last Name
   b. Date of Birth

   If either of these elements within the `<student>` and `<borrower>` do not match, COD will return Reject Edit 147 in the response.

3. If the same SSN is submitted within the student and borrower tags (Grad PLUS) and the student and borrower first name don’t match, COD will return Warning Edit 148.
4. If the <Student> or <Borrower> Person Identifier tags match (Grad PLUS initial submission) AND the <LastName> and/or <BirthDate> tags are submitted on both the student and borrower levels, OR the COD system shows that the student and borrower are the same person (Grad PLUS changes) and the Last Name and/or Date of Birth tags are submitted on both the student and borrower levels, then the <LastName> and/or <BirthDate> tags must be the same or the COD system will reject the record with Reject Edit 147.

5. If the <Student> or <Borrower> Person Identifier tags don’t match (Parent PLUS initial submission) and the <BirthDate> tags are submitted on both the student and borrower levels, OR the COD system shows that the student and borrower are different people (Parent PLUS changes) and the <BirthDate> tags are submitted on both the student and borrower levels, then the <BirthDate> tags must be different or the COD system will reject the record with Reject Edit 149.

6. A Direct PLUS Loan borrower with a Declined Original Credit Decision must obtain an approved credit appeal due to extenuating circumstances or an approved endorser, and complete PLUS Credit Counseling before the school can disburse. If an actual disbursement is submitted without the completion of the above, the record will reject with edit 217.

Example
A Parent PLUS award is created for Student A and Borrower B with the following date of birth information:

<table>
<thead>
<tr>
<th>Person</th>
<th>Date of Birth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student A</td>
<td>1981-01-01</td>
</tr>
<tr>
<td>Borrower B</td>
<td>1955-02-02</td>
</tr>
</tbody>
</table>

Borrower B is also a Student on a Pell award. If the Pell award is submitted with a <BirthDate> tag changing for Borrower B date of birth to 1981-01-01, Borrower B’s date of birth will match Student A’s date of birth and Reject Edit 149 will be triggered.

7. When changing the SSN for a Grad PLUS borrower using the Grad PLUS loan, the SSN change must be submitted at the borrower level. If it is submitted at the student level only without a corresponding change at the borrower level, the change will be rejected with the following Reject Edits:
   a. Reject Edit 016 for Award Years 2007-2008 and prior.
   b. Reject Edit 151 for Award Years 2008-2009 and forward.
If credit is declined or pending, then the change must be submitted in both the Borrower and the Student.

8. For Award Year 2005-2006 and forward, COD will accept a PLUS award with the same student and borrower information if the student’s Grade Level is 6 or higher. If the student and borrower identifiers are the same and the student’s Grade Level is less than 6, COD will reject the record using the following error codes:

   a. Reject Edit 16 for Award Years 2007-2008 and prior.
   b. Reject Edit 150 for Award Years 2008-2009 and forward.

9. For Award Year 2012-2013 and forward, Reject edit 181 and Reject edit 182 are no longer triggered on PLUS awards origination and change records. The COD System accepts and stores changes to all student and borrower level person identifier fields (SSN, DOB, Last Name), submitted for PLUS Awards with declined or pending credit decisions.

10. For Award Year 2012-2013 and forward, Edit 121 will allow borrower SSN change on PLUS awards that have been zeroed out or fully funded.

11. Beginning in March 2012, schools will no longer be required to send in all tags when performing changes on Direct PLUS Loans with denied credit. Student and award level maintenance may be done using the minimum required tags.

12. Beginning in March 2015, if the Direct PLUS Loan borrower has a Declined Original Credit Decision on file they will be required to complete PLUS Credit Counseling even if an endorser is obtained. If an actual disbursement is submitted without the completion of PLUS Credit Counseling or an endorser, the record will reject with edit 217.

**Business Rules**

1. The Student Identifier is located in the Person complex element of the Common Record and is reported by the school.

2. A Student Identifier is a required data element for all submissions of a Common Record.

3. A Student Identifier consists of the `<Student>` tag and three attributes: the student’s current Social Security Number, current Date of Birth, and current Last Name.
a. The Social Security Number portion of the Student Identifier must contain nine digits.

b. The Social Security Number portion of the Student Identifier must be within the range of 001-01-0001 to 999-99-9998.

c. The Date of Birth portion of the Student Identifier must be in the CCYY-MM-DD format.

d. The Date of Birth portion of the Student Identifier must be greater than 1922-01-01 and less than 2013-12-31.

e. The Last Name portion of the Student Identifier may consist of upper case letters A-Z, spaces, period, apostrophe and dash.

f. The Last Name portion of the Student Identifier may be blank.

4. All three attributes of the Student Identifier (current Social Security Number, current Date of Birth, and current Last Name) are required for processing by the COD System.

5. The Student Identifier submitted by a school to establish the student on COD is matched to data from the CPS.

   a. For Pell and TEACH Grants, the SSN, Date of Birth, and first two characters of the Last Name are matched with the CPS data.

   b. For Subsidized, Unsubsidized Direct Loans and PLUS Loans, the SSN and Date of Birth of the student are matched with the CPS data.

6. If a match is found on CPS, COD accepts the student and establishes the student identifier on COD. The student identifier must be submitted in subsequent transactions for that student.

   "Establishing Borrowers"
   For Direct PLUS Loan Awards the student is established and the person (either a parent borrower or the same graduate student borrower) must be established. Parent borrowers are not matched against data from the CPS. Student information is matched against data from the CPS.

7. If a match is not found on CPS, COD rejects the student and returns a Reject Edit of 011.

   "Changing Student Identifiers"
   Please refer to the Changing Student Identifier Information section for more information on making corrections or updates to the student identifier.

Example
Changing Student Identifier Information

To change Student Identifier information, the school or student must first submit a correction to the ISIR, which will result in another transaction on the CPS. After the correction has been submitted to and accepted by the CPS, the school must send a Common Record to the COD System reporting the student tag with the previously reported Student Identifier information currently stored on COD and the changed data in the corresponding simple element tag (Social Security Number, Date of Birth, or Last Name).

Business Rules

1. COD stores one Student Identifier for a student; COD does not store separate Student Identifiers for each award.

2. Changes to the Student Identifier data elements must be submitted in the Social Security Number, Date of Birth, and/or Last Name simple element tags and NOT in the Student tag. Changes submitted in the Student tag will not be recognized by the COD System.

On the first submission for a student for a new award year, it is recommended that the school submit the student identifier data elements in both the Student Complex Element and the SSN, Last Name, and Date of Birth simple elements. In some cases, unbeknownst to the school submitting the record, students have already existed on COD with different Person Identifier data (usually a different Last Name) due to activity at another school for a previous award year.

By submitting the SSN, Last Name, and Date of Birth simple elements, the school will trigger COD to attempt to change the student’s identifier data for the student. If a change is made, all schools with records for that student will receive an SSN/Name/Date of Birth Change Report.

In these cases, if the simple elements are not submitted, the school’s award record may still accept (assuming it passes the CPS match and all other applicable edits), but the Person Identifier data stored on COD will not be updated since COD does not recognize Person Identifier changes submitted in the Student tag. The previous Person Identifier data will appear in all COD system generated transactions and reports until the simple elements are submitted.

Alternatively, schools may use the COD Web site to search person data by SSN to confirm that the Person Identifier data on COD matches the Person Identifier data on their systems and determine if a Person Identifier change is necessary. Schools may also submit Person Identifier changes through the COD Web site if their software does not permit the submission of the SSN, Last Name, and Date of Birth simple elements.
3. Upon receipt of a changed Social Security Number, Date of Birth, or Last Name simple element from the school, the COD System attempts to match the changed simple element tag against the CPS.

   a. If an identical change is found on the CPS, the COD System accepts the changed simple element, updates the Student Identifier, and sends a Response to the school.

   b. If an identical change is not found on the CPS, the COD System rejects the changed simple element and sends a Response to the school with Reject Edit 012.

4. Regardless of whether the changed simple element is accepted or rejected by the COD System, the old Student Identifier is returned in the Response.

5. If the changed simple element is accepted, the school must submit the new Student Identifier combination in future transmissions.

6. If the changed simple element is rejected, the old Student Identifier combination must be used in future transmissions.

7. The COD System stores the Social Security Number previously submitted to the COD System for query purposes on the COD Web site.

8. If the Social Security Number, Date of Birth, or Last Name simple element is submitted with the same value that is listed in the attribute on the COD System, no update takes place. If the award year submitted on the change record is lower than the highest award year listed for the student on the COD System, or if the CPS transaction number on the change record is either lower than the highest CPS transaction number on the COD System for that award year and student or equal to the highest CPS transaction number and the Person Identifier data does not match with CPS, no update takes place and a warning is sent to the school with error code 116.

9. If a combination of the current Social Security Number, current Date of Birth, or current Last Name simple elements are changed in the same submission, all changes must be matched on the CPS.
a. If all changes are not matched on the CPS, the COD System rejects all changed simple elements and the old Student Identifier is returned in the Response to the school.

10. If the Student SSN matches the Borrower SSN on the incoming file and the Grad PLUS award already exists on the COD System, the following Person Identifiers must match:
   
a. **For Parent PLUS:** Complete Student Last Name change and complete Borrower Last Name change

b. **For all awards:** Complete Student Date of Birth change and complete Borrower Date of Birth change

c. **For all awards:** Complete Student SSN change and complete Borrower SSN

If any of the pairs of Person Identifiers mentioned above do not match, the COD System will return Reject Edit 147.

11. If the Student SSN differs from the Borrower SSN on the COD System and the Parent PLUS award already exists on the COD System, the following Person Identifiers must not match:

   a. Complete Student Date of Birth change and complete Borrower Date of Birth change

   b. Complete Student Date of Birth change and what currently exists on the COD System for the Borrower Date of Birth, AND no Borrower Date of Birth change tag is submitted

   c. Complete Borrower Date of Birth change and what currently exists on the COD System for the Student Date of Birth, AND no Student Date of Birth change tag is submitted

   If any of the pairs of Person Identifiers mentioned above do match, the COD System will return Reject Edit 149.

12. Changes made to a Grad PLUS Borrower’s SSN must also be made at the Student level. Attempts to change the SSN at Student level without a corresponding change at the Borrower level will result in:

   a. Reject Edit 016 for Award Years 2007-2008 and prior

   b. Reject Edit 151 for Award Years 2008-2009 and forward

13. If a PLUS award for Parent of a Dependent Undergraduate Student new origination or award change
record is submitted with a change to the Student SSN that would result in the Student SSN equal to the Borrower SSN, and the Student’s SSN does not currently equal the Borrower’s SSN on the COD System, the COD System will trigger Reject Edit 152.

14. If a PLUS award for Parent of a Dependent Undergraduate Student new origination or award change record is submitted with a change to the Borrower SSN that would result in the Student SSN equal to the Borrower SSN, and the Student’s SSN does not currently equal the Borrower’s SSN on the COD System, the COD System will trigger Reject Edit 153.

**Example**

A student’s last name changes from Oldhat to Newbry. Once the correction has been submitted to the CPS, the appropriate submission to the COD System is:

```xml
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1974-01-01</BirthDate>
    <LastName>OLDHAT</LastName>
  </Index>
  <Name>
    <LastName>NEWBRY</LastName>
  </Name>
</Student>
```

The COD Response contains the old student identifier:

```xml
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1974-01-01</BirthDate>
    <LastName>OLDHAT</LastName>
  </Index>
</Student>
```

If the COD System accepts the change, subsequent transmissions by the school must contain:

```xml
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1974-01-01</BirthDate>
    <LastName>NEWBRY</LastName>
  </Index>
</Student>
```

If the COD System rejects the change, subsequent transmissions by the school must contain:

```xml
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1974-01-01</BirthDate>
    <LastName>OLDHAT</LastName>
  </Index>
</Student>
```
**Borrower Identifier**

The Borrower Identifier is used to submit parent or graduate student borrower data when processing a PLUS Loan. The COD Borrower Identifier is composed of the parent or graduate student borrower’s current Social Security Number, current Date of Birth, and current Last Name.

**Business Rules**

1. The Borrower Identifier is located in the Person complex element of the Common Record and is reported by the school.

2. A Borrower Identifier is a required data element for all submissions for a PLUS Loan.

3. A Borrower Identifier consists of the Borrower tag and three attributes: the person’s current Social Security Number, current Date of Birth, and current Last Name.
   
   a. The Social Security Number portion of the Borrower Identifier must contain nine digits.
   
   b. The Social Security Number portion of the Borrower Identifier must be within the range of 001-01-0001 to 999-99-9998.
   
   c. The Date of Birth portion of the Borrower Identifier must be in the CCYY-MM-DD format.
   
   d. The Date of Birth portion of the Borrower Identifier must be greater than 1919-01-01 and less than 2010-12-31.
   
   e. The Last Name portion of the Borrower Identifier may consist of upper case letters A-Z, spaces, period, apostrophe and dash.
   
   f. The Last Name portion of the Borrower Identifier may be blank.

4. The Borrower Identifier submitted by a school to establish the parent or graduate student borrower on COD is **not** matched with data from CPS.

5. For Award Year 2005-2006 and forward, COD will accept a PLUS award with the same student and borrower information if the Grade Level for the student is 6 or higher. Otherwise, the record will trigger:
   
   a. Reject Edit 016 for Award Years 2007-2008 and prior.
   
   b. Reject Edit 150 for Award Years 2008-2009 and forward.
6. The Borrower Identifier is changed using the same process as updating a Student Identifier. However, the updates to a Borrower Identifier are NOT matched to CPS data on file at COD.

7. If the Student SSN matches the Borrower SSN, the following Person Identifiers must match:
   a. Complete Student Last Name and complete Borrower Last Name
   b. Complete Student Date of Birth and complete Borrower Date of Birth
   c. Complete Student Last Name change and complete Borrower Last Name change
   d. Complete Student Date of Birth change and complete Borrower Date of Birth change
   e. Complete Student SSN change and complete Borrower SSN change

   If any of the pairs of Person Identifiers mentioned above do not match, the COD System will return Reject Edit 147.

8. If the Student SSN differs from the borrower SSN, the following Person Identifiers must not match:
   a. Complete Student Date of Birth and complete Borrower Date of Birth
   b. Complete Student Date of Birth change and complete Borrower Date of Birth change
   c. Complete Student Date of Birth change and Borrower Date of Birth, AND No Borrower Date of Birth change tag is submitted
   d. Complete Borrower Date of Birth change and Student Date of Birth, AND No Student Date of Birth change tag is submitted

   If one pair of the Person Identifiers mentioned above do match, the COD System will return Reject Edit 149.

Example
<Borrower>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1964-01-01</BirthDate>
    <LastName>SMITH</LastName>
  </Index>
</Borrower>

Matching First Names
If the complete Student First Name does not match complete Borrower First Name, the COD System will return Warning Edit 148.

Correct SSN on MPN
When originating a new loan with the correct SSN, a new Promissory Note may be required.
Changing Borrower Identifier Information

When changing borrower information for a Parent PLUS loan, it is important to ensure that all changes will not cause the borrower information to match the student information. When changing Borrower identifier information for a Grad PLUS loan, it is important to ensure all changes made to the borrower information are reflected in the student information changes.

Business Rules

1. For Direct PLUS Loan Borrowers (either parent or graduate student), their SSN is used to perform the PLUS credit check. Attempts to change the SSN for a PLUS Borrower (for any award type) will reject with Reject Edit 121 if the following conditions exist:
   a. PLUS award amount is greater than zero, AND
   b. The sum of all actual disbursements for PLUS loans does not equal the PLUS award amount (PLUS award is not fully disbursed).

2. Schools can change the SSN for a PLUS Borrower (either parent or graduate student) if the PLUS award amount has been fully disbursed for at least 24 hours.

3. If a SSN change is required for a PLUS Borrower (either parent or graduate student), the school must do one of the following:
   a. If no actual disbursements, reduce the loan to zero and originate a new loan with the correct SSN.
   b. If partial disbursement, reduce the loan to the disbursed amount and originate a new loan for the balance of eligibility with the correct SSN.

4. Changes made to a Grad PLUS Borrower’s SSN must also be made at the Student level. Attempts to change the SSN at Student level without a corresponding change at the Borrower level will result in:
   a. Reject Edit 016 for Award Years 2007-2008 and prior
   b. Reject Edit 151 for Award Years 2008-2009 and forward

5. If the Student SSN matches the Borrower SSN on the incoming file and the Grad PLUS award already exists on the COD System, the following Person Identifiers must match:
   a. Complete Student Last Name change and complete Borrower Last Name change

Matching First Names
If the complete Student First Name does not match complete Borrower First Name, the COD System will return Warning Edit 148.
b. Complete Student Date of Birth change and complete Borrower Date of Birth change

c. Complete Student SSN change and complete Borrower SSN change

If one pair of the Person Identifiers mentioned above do not match, the COD System will return Reject Edit 147.

6. If the Student SSN differs from the Borrower SSN on the COD System and the Parent PLUS award already exists on the COD System, the following Person Identifiers must not match:

a. **For Parent PLUS:** Complete Student Date of Birth change and complete Borrower Date of Birth change

b. **For all awards:** Complete Student Date of Birth change and what currently exists on the COD System for the Borrower Date of Birth, AND no Borrower Date of Birth change tag is submitted

c. **For all awards:** Complete Borrower Date of Birth change and what currently exists on the COD System for the Student Date of Birth, AND no Student Date of Birth change tag is submitted

If one pair of the Person Identifiers mentioned above do not match, the COD System will return Reject Edit 149.

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**CPS Transaction Number**

The CPS Transaction Number is a required field on the Common Record for Pell Grant, TEACH Grant, and Direct Loan (DL Subsidized, DL Unsubsidized, DL PLUS) processing.

**Business Rules**

1. The CPS Transaction Number is a required field on the Common Record for Pell Grant, TEACH Grant, and Direct Loan (DL Subsidized, DL Unsubsidized, and DL PLUS) Award information.

**Student Identifier and Data Elements Matched against the CPS**

COD performs two student matches against CPS. The first match confirms that the Student Identifier exists on the CPS. This match does not utilize the CPS Transaction Number submitted by the school. The second match validates certain data elements for editing purposes. This match utilizes the CPS Transaction Number submitted by the school.

**Business Rules**
1. The COD System stores one Student Identifier for a student. The COD System does not store separate Student Identifiers for each award.

2. The CPS Transaction Number is stored at the Award level; the COD System stores a separate CPS Transaction Number for each award.

3. The COD System performs a match against the CPS when a Common Record contains:
   a. A new student with an award (please see example 1)
   b. A change to the Student Identifier (please see example 2)
   c. A new award with a new CPS Transaction Number (please see example 2)
   d. An existing award with a new CPS Transaction Number (please see example 3)

4. When a Common Record contains a new student with a Pell, or TEACH Grant award:
   e. COD matches the SSN, Date of Birth, first two characters of the Last Name, and the CPS Transaction Number with data from CPS.
   f. COD uses the CPS Transaction Number submitted to pull data elements from CPS for processing the award.

5. When a Common Record contains a new student with a Subsidized or Unsubsidized Direct Loan award:
   g. COD matches the SSN, Date of Birth, and the CPS Transaction Number with data from CPS.
   h. COD uses the CPS Transaction Number submitted to pull data elements from CPS for processing the award.

6. When a Common Record contains a change to the Student Identifier:
   i. COD checks that any CPS Transaction Number greater than the CPS Transaction Number used to establish the student exists in the data from CPS. If the CPS Transaction Number on the change record is either lower than the highest CPS Transaction Number on the COD database or equal to the highest CPS Transaction Number and the Person Identifier

---

**Date of Death Notification**

In an effort to assist schools in identifying students who are deceased, COD uses data provided from the Social Security Administration (SSA) through the CPS to trigger a warning Edit 215.

When a school sends a change to a Direct Loan award with a new CPS Transaction Number, COD does not go back out to CPS and pull information on that CPS Transaction Number.
data does not match with CPS, no update to the student identifier takes place and Warning Edit 116 is sent to the school.

j. For Direct Loans the match is only on the Social Security Number (SSN) and Date of Birth.

7. When a Common Record contains a new award for an existing student:

k. The Student Identifier tag must be the current Student Identifier on file at COD.

l. COD uses the CPS Transaction Number submitted to pull data elements from CPS for processing the award.

m. If the student identifier data elements do not match the SPECIFIC CPS Transaction Number, the record will reject with edit code 24.

8. When a Common Record contains a new CPS Transaction Number for an existing award:

n. The Student Identifier needs to be the current Student Identifier on file at COD.

o. COD uses the new CPS Transaction Number submitted to pull data elements from CPS for processing the award.

p. COD does NOT match the student identifier data elements with the CPS Transaction Number submitted in the Award complex element

9. COD matches the student identifier data elements in the following order: SSN, Date of Birth, and Last Name.

10. When a new award is submitted with a CPS Transaction Number already used by a previously accepted award for the same student, a new CPS match is NOT performed.

11. A later CPS Transaction Number submitted by a student or another school does NOT affect a match performed using an earlier CPS Transaction Number.

Example 1: New Student, New Award

A school submits a Pell Grant for a student (SID = 3188888881983-03-04Jones) using CPS Transaction Number 01. There is a match at COD on the CPS data.

<table>
<thead>
<tr>
<th>CPS</th>
<th>CPS Abbreviated Applicant File</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAR ID</td>
<td>SSN</td>
</tr>
<tr>
<td>318888888</td>
<td>318888888</td>
</tr>
</tbody>
</table>
This establishes the student on the COD Database with a student identifier \(3188888881983-03-04\)JONES.

<table>
<thead>
<tr>
<th>COD SID Database</th>
</tr>
</thead>
<tbody>
<tr>
<td>SID</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award</td>
</tr>
<tr>
<td>Pell</td>
</tr>
</tbody>
</table>

**Example 2: New Award, New CPS Transaction Number and Change to Student Identifier**

The student gets married resulting in a Name change from Jones to Taylor. The student also becomes a graduate student and is no longer Pell eligible. These changes have already been reported to CPS resulting in a CPS Transaction Number 03.

The school submits a Direct Loan award using CPS Transaction Number 03 and the current SID of \(3188888881983-03-04\)JONES, but also submits the name change of Taylor. The Direct Loan award is accepted as there is a match with CPS data at COD for the SSN and Date of Birth and CPS Transaction Number 03.

<table>
<thead>
<tr>
<th>CPS Abbreviated Applicant File</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAR ID</td>
</tr>
<tr>
<td>318888888Jo01</td>
</tr>
<tr>
<td>318888888Jo02</td>
</tr>
<tr>
<td>318888888Jo03</td>
</tr>
</tbody>
</table>

The student identifier is updated to \(3188888881983-03-04\)TAYLOR.

<table>
<thead>
<tr>
<th>COD SID Database</th>
</tr>
</thead>
<tbody>
<tr>
<td>SID</td>
</tr>
<tr>
<td>SID</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award</td>
</tr>
<tr>
<td>Pell</td>
</tr>
<tr>
<td>Direct Loan</td>
</tr>
</tbody>
</table>

**Example 3: Change to CPS Transaction Number on Existing Award**

Suppose the student’s EFC changes. The school submits an update to the Direct Loan using CPS Transaction Number 04. The school submits using student identifier: \(3188888881983-03-04\) TAYLOR.
**Parent Identifier Matched Against the CPS and Credit Reporting Agency**

COD matches parent identifiers against the student’s CPS transactions and against the identifiers returned by the Credit Reporting Agency.

**Business Rules:**

1. Upon receipt of a parent Direct PLUS Loan origination or identifier change, COD matches the borrower SSN and borrower DOB against parent identifiers on a student’s CPS transactions across all award years.
2. Only transactions where the parent identifiers have a Social Security Administration (SSA) SSN Match Flag of ‘4’ (SSN, name, and date of birth match) are used.
3. If no matching transaction is found, COD matches the parent identifier data against the identifier data returned by the credit reporting agency.
4. If the data matches either a CPS transaction or the credit reporting agency data, the record is accepted.
5. If the parent identifiers don’t match a CPS transaction or the credit reporting agency identifier data, the record will reject with edit 216.

**Data Elements Pulled from the CPS**

The COD System pulls certain data elements from information provided by the CPS for editing purposes only.
Business Rules

1. The COD System uses the CPS Transaction Number reported in the Award complex element to pull certain data elements from information provided by the CPS.

2. For each Pell Grant award received, the COD System always pulls the following data elements from the CPS:
   a. Expected Family Contribution (EFC)
   b. Verification Selection

3. The COD System determines if certain data elements are transmitted in the Common Record or already exist for the student and award year on the COD database. If neither is true, the COD System will ‘pull’ these data elements from information provided by the CPS.
   a. For each Direct Loan, Pell Grant, or TEACH Grant award received, the following data elements are pulled from the CPS information when absent on both the Common Record submission and the COD database:
      i. Address (If any of the fields are absent: Address, City, State [Domestic only], State/Province [International only], Postal Code, Country [International only]), email Address
   b. The COD System will pull the student address from the highest CPS transaction number for the most recent award year.
      i. First Name
      ii. Loan Default/Grant Overpayment for student
      iii. Citizenship status

Citizenship Status Code Processing for Pell, TEACH and Direct Sub/Unsub

The functionality for the Citizenship Status has been modified to standardize the logic for all programs.

With the 2009-2010 Award Year and forward, the COD System accepts a value of '2 - Eligible Non-Citizen' in the Citizenship Status Code field as a valid value to receive Pell awards. And for 2010-2011, this functionality was added for TEACH, and Direct Sub/Unsub programs. If a Citizenship Status Code of '1' or '2' is submitted on the Common Record, the COD System will accept and build the award. If a value other than '1' or '2' is submitted on the Common Record, COD will reject the student.
Business Rules

1. If the Citizenship Status Code field is not populated on the incoming origination, the COD System will now evaluate the values from the CPS data. If the Citizenship Status Code is not populated, the COD System will evaluate the value in the 'Social Security Administration (SSA) Citizenship Flag' field.

2. If the SSA Citizenship Flag field from CPS is 'blank' or 'A', COD will accept and build the award with a Citizenship Status of '1'. If the SSA Citizenship Flag field on CPS is a value other than 'A' or 'blank', COD will look for a value in the 'DHS Match Flag' field on the CPS data.

3. If a value of 'Y' is found in the DHS Match Flag, the COD System will accept and build the Citizenship Status with a value of '2'. If there is any value other than 'Y' in the DHS Match Flag, COD will check the value in the 'Secondary DHS Match Flag' field of the CPS data.
   a. If the Secondary DHS Match Flag has a value of 'Y', COD will accept and build the award with a Citizenship Status of '2'.

4. COD will reject a new origination record if the Citizenship Status Code is not submitted on the incoming origination, the SSA Citizenship Status field is not 'A' or 'blank', the DHS Match Flag is a value other than 'Y', and the Secondary DHS Match Flag is a value other than 'Y'. If a value is pulled from CPS, this will be stored on the COD System but will not be returned on the Common Record response.

Example
The COD Response complex element contains the <CitizenshipStatusCode> field within the Citizenship complex submitted in the Common Record:

```xml
<Citizenship>
  <CitizenshipStatusCode>1</CitizenshipStatusCode>
</Citizenship>
```

Note Message Field
A School Note Message field, <SchoolNoteMessage>, is included on the Common Record. It is nested within the <Note> complex element, which is nested within the Person, Award, and Disbursement complex elements. This field can be used by the school for any purpose and is ignored during COD processing.

Business Rules

1. Regardless of whether the school opts for a Full or Standard Response, the School Note Message field is returned in the same Person, Award, and Disbursement complex elements as was submitted by the school.
2. The School Note Message field can be viewed and modified on the COD Web site for award and disbursement records.

3. No field level compression is allowed in this field.

**Example**
The school uses a unique Person Identifier for the student in their system. The school uses the `<SchoolNoteMessage>` field in the Student Award complex element to record this unique Person Identifier.

```xml
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1973-01-01</BirthDate>
    <LastName>SMITH</LastName>
  </Index>
  <Note>
    <SchoolNoteMessage>888888</SchoolNoteMessage>
  </Note>
</Student>
```

The COD Response complex element contains the `<SchoolNoteMessage>` field with the content submitted in the Common Record:

```xml
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1973-01-01</BirthDate>
    <LastName>SMITH</LastName>
  </Index>
  <Note>
    <SchoolNoteMessage>888888</SchoolNoteMessage>
  </Note>
</Student>
```

**Updating Phone Numbers**
The COD System only stores one phone number for each person.

**Business Rules**

1. The Common Record allows for a maximum occurrence of three phone number tags per person; however the COD System stores only one or the last occurrence (if more than one is submitted) of phone number as Home Phone.

   a. The COD System does not store a value for Alternate Phone 1 or Alternate Phone 2.
Beginning in March 2015, the Student Eligibility Code tag is Weeks Programs Academic Year used in place of Ability to Benefit Code tag.

Beginning with the 2011 – 2012 Award Year, the COD system started collecting Student Eligibility information from schools. The Student Eligibility data is applicable for the Pell Grant, TEACH Grant, and Direct Loan Programs. For applicable students without a high school diploma or its recognized equivalent, you are required to indicate which students were admitted on the basis of successfully passing an approved ATB test, or successfully earned 6 credits or the equivalent, or participated in a State process approved by the Secretary or were home schooled. For Award Years prior to 2011 – 2012, if Student Eligibility data is submitted, the COD System will not store the Ability to Benefit data elements, and will not include the Student Eligibility tags in the common record response.

In 2013-2014, the <StudentEligibilityCode> was made to be a required field used to record the Student Eligibility for all awards, for all students.

In March 2015, the <AbilityToBenefitCode> tag was retired and replaced with the <StudentEligibilityCode>.

In October 2015, the COD System no longer accepts the value of ‘08’, and added the values of ‘11’, ‘12’, ‘13’, and ‘14’.

### Student Eligibility Code

<table>
<thead>
<tr>
<th>Student Eligibility Code</th>
<th>Title</th>
<th>Description</th>
<th>Valid Award Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Ability to Benefit Testing Completed</td>
<td>The student first enrolled in any Title IV eligible postsecondary program before 7/1/ 2012 AND passed an approved ATB test.</td>
<td>2011-2012 through 2014-2015</td>
</tr>
<tr>
<td>01</td>
<td>ATB-Test Completed-1st Enrolled Before 7/1/12</td>
<td>The student first enrolled in any Title IV eligible postsecondary program before 7/1/ 2012 AND passed an approved ATB test.</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td>02</td>
<td>College Credits</td>
<td></td>
<td>2011-2012 through 2014-2015</td>
</tr>
<tr>
<td>02</td>
<td>ATB-College Credits-1st Enrolled Before 7/1/12</td>
<td>The student first enrolled in any Title IV eligible postsecondary program before 7/1/2012 AND was determined to have the ability to benefit based on completion of: • 6 credit hours, • 225 clock hours, or • the equivalent that are applicable toward a degree or certificate offered by your institution.</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td>03</td>
<td>State Process</td>
<td>Invalid for all award years</td>
<td></td>
</tr>
<tr>
<td>04</td>
<td>Home Schooled</td>
<td>The student has completed a secondary school education in a homeschool setting treated as a homeschool or private school under State law, AND obtained a homeschool completion credential. If State law does not require a homeschool credential, the student has completed a secondary school education in a homeschool setting that qualifies as an exemption from compulsory school attendance requirements under State law.</td>
<td>2011-2012 and forward</td>
</tr>
<tr>
<td>05</td>
<td>Other</td>
<td>Invalid for all award years</td>
<td></td>
</tr>
<tr>
<td>06</td>
<td>High School Diploma</td>
<td>The student has a high school diploma.</td>
<td>2013-2014 and forward</td>
</tr>
<tr>
<td>07</td>
<td>GED certificate or state equivalent test</td>
<td>2013-2014</td>
<td></td>
</tr>
<tr>
<td>07</td>
<td>GED or State Auth. H.S. Equivalent Certificate</td>
<td>The student has a General Educational Development (GED) certificate or a state certificate or transcript received after the student passed a State-authorized examination, e.g.: • High School Equivalency Test (HiSET), • Test Assessing Secondary Completion (TASC), • California High School Proficiency Exam (CHSPE), or • other State-authorized examination the State recognizes as equivalent to a high school diploma.</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td>08</td>
<td>State Authorized High School Equivalent Certificate</td>
<td>Invalid for all award years</td>
<td></td>
</tr>
<tr>
<td>09</td>
<td>Academic Transcript of 2-yr Program Acceptable for Full Credit Transfer to a BA Program</td>
<td>The student has an academic transcript documenting successful completion of at least a two-year program that is acceptable for full credit toward a bachelor's degree. Note: For graduate or professional programs where a high school diploma or its equivalent is not necessary for admission to the program and the student has a bachelor's degree, submit &quot;09&quot;.</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td></td>
<td>Description</td>
<td>Details</td>
<td>Date Range</td>
</tr>
<tr>
<td>---</td>
<td>-----------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>10</td>
<td>Program Leads to at least an Assoc. Degree, Excelled in H.S. and met the</td>
<td>Student is seeking enrollment in an educational program that leads to</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td></td>
<td>Admissions Requirements</td>
<td>at least an associate degree or its equivalent</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>AND has not completed high school, but the institution documents that</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>the student excelled academically in high school and has met the</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>formalized, written policies of that postsecondary institution for</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>admitting such students.</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15</td>
<td>The student first enrolled in any Title IV eligible postsecondary</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td></td>
<td></td>
<td>program on or after 7/1/2012 but before 7/1/2015, AND is currently</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>enrolled in a Title IV eligible postsecondary program that is part of</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>an eligible career pathway program, AND passed an approved ATB test.</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>ATB-Test Completed- 1st Enrolled 7/1/15 or After</td>
<td>The student first enrolled in any Title IV eligible postsecondary</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td></td>
<td></td>
<td>program on or after 7/1/2012, AND is currently enrolled in a Title IV</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>eligible postsecondary program that is part of an eligible career</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>pathway program, AND passed an approved ATB test.</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15</td>
<td>Student first enrolled in any Title IV eligible postsecondary program</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td></td>
<td></td>
<td>on or after 07/1/2012 but before 7/1/2015, AND is currently enrolled</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>in a Title IV eligible postsecondary program that is part of an eligible</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>career pathway program, AND was determined to have the ability to</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>benefit based on completion of:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 6 credit hours,</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 225 clock hours, or</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• the equivalent that are applicable toward a degree or certificate</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>offered by your institution.</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>ATB-College Credits-1st Enrolled 7/1/15 or After</td>
<td>Student first enrolled in any Title IV eligible postsecondary program</td>
<td>2015-2016 and forward</td>
</tr>
<tr>
<td></td>
<td></td>
<td>on or after 7/1/2015, AND is currently enrolled in a Title IV eligible</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>postsecondary program that is part of an eligible career pathway</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>program, AND was determined to have the ability to benefit based upon</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>satisfactory completion of:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 6 credit hours,</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• 225 clock hours, or</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• the equivalent that are applicable toward a degree or certificate</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>offered by your institution.</td>
<td></td>
</tr>
</tbody>
</table>

The `<StudentEligibilityCode>` tag is used to report the following:
1. A student’s eligibility to receive Federal Student Aid without a high school diploma or its recognized equivalent

   A. The `<AbilityToBenefitTestCode>` tag is used to report the type of test the student completed to be eligible to receive Federal Student Aid.

   B. The `<AbilityToBenefitTestAdministratorCode>` tag is used to report the specific test administrator for the student’s test.

   C. The `<AbilityToBenefitCompletionDate>` tag is used to report the date that the student completed their Ability To Benefit, to become eligible to receive Federal Student Aid.

   D. The `<AbilityToBenefitStateCode>` tag is used to report the state in which the student completed their state process.

    Note: Currently, there are no state approved programs.

2. The completion of high school or its equivalent (GED certificate, state equivalent test, or home school).

3. A “Student Eligibility Code Change” event will be created to track any changes.

**Business Rules**

1. If the `<StudentEligibilityCode>` element is submitted with a value of ‘01’ (ATB-Test Completed-1st Enrolled Before 7/1/12), ‘11’ (ATB-Test Completed-1st Enrolled 7/1/12 to 6/30/15), or ‘12’ (ATB-Test Completed-1st Enrolled 7/1/15 or After), the COD system will require the ATB Test Code, Test Administrator Code, and Completion Date elements, unless the values are already stored on the system for that award.

2. For home schooled students without a high school diploma or its recognized equivalent, schools should submit the Student Eligibility Code of ‘04’ (Home Schooled).

3. The COD system will validate the values submitted within the Student Eligibility Code data elements. The “Student Eligibility Code” elements can be submitted on the Common Records or via the COD Web site.

4. If the `<StudentEligibilityCode>` element is submitted with a value of ‘02’ (ATB-College Credits-1st Enrolled Before 7/1/12), ‘04’ (Home Schooled), ‘06’ (High School Diploma), ‘07’ (GED or State Auth. H.S. Equivalent Certificate), ‘09’ (Academic Transcript of 2-yr Program Acceptable for Full Credit Transfer to a BA Program), ‘10’ (Program Leads to at least an Assoc. Degree, Excelling in H.S. and met the Admissions Requirements), ‘13’ (ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15), or ‘14’ (ATB-College Credits-1st Enrolled 7/1/15 or After) no other Student Eligibility Code data elements are required.

    Note: For graduate or professional programs where a high school diploma or its equivalent is not necessary for admission to the program, and the student has a bachelor’s degree, submit ‘09’.
5. If a student already has an award on file, the Student Eligibility Code information will not be pre-populated when creating new awards in future. This will apply to awards both within the same program type and across program types.

6. If the COD system determines a Student Eligibility Code element has an invalid value, edit 996 will be returned for invalid value submitted.

7. The Student Eligibility Code data elements will be updateable and the COD system will allow schools to null out stored values. Note: the COD system will return a value of ‘01-01-0001’ in the <AbilityToBenefitCompletionDate> in the Common Record and Web response files if the <AbilityToBenefitCompletionDate> field has been nulled out by the school.

8. If a school submits an award origination record for any program with the Student Eligibility Code = ‘01’ (ATB-Test Completed-1st Enrolled Before 7/1/12), ‘11’ (ATB-Test Completed-1st Enrolled 7/1/12 to 6/30/15), or ‘12’ (ATB-Test Completed-1st Enrolled 7/1/15 or After) and the Completion Date is not valid for the submitted Test Code or the Completion Date is greater than the current COD processing date, reject Edit 196 will be triggered.

9. If a school submits an award origination record for any program with the Student Eligibility Code = ‘01’ (ATB-Test Completed-1st Enrolled Before 7/1/12), ‘11’ (ATB-Test Completed-1st Enrolled 7/1/12 to 6/30/15), or ‘12’ (ATB-Test Completed-1st Enrolled 7/1/15 or After) and the school does not submit the Ability to Benefit Test Administrator Code, Ability to Benefit Test Code, and the Ability to Benefit Completion Date data elements, reject Edit 197 will be triggered.

10. If a school submits an award origination record for any program with the Student Eligibility Code with a valid value and any combination of the additional Student Eligibility Code elements are also submitted with valid values, when they are not required for the Student Eligibility Code submitted, reject Edit 198 will be triggered.

11. Beginning in March 2013, the COD System no longer accepts Student Eligibility Codes of ‘03’ (State Process) and ‘05’ (Other) for all award years.

   a. Note: Existing records with a value of ‘03’ or ‘05’ must be changed to a new valid value.

12. In March 2013, the COD System began accepting two new Student Eligibility values of ‘06’ (High School Diploma) and ‘07’ (GED certificate or state authorized high school equivalent certificate) for Award Years 2013-2014 and forward.

13. In October 2015, the COD System will no longer accept the Student Eligibility Code values of ‘08’ (State Authorized High School Equivalent Certificate) and will introduce four new Student Eligibility Code Values of ‘11’ (ATB-Test Completed-1st Enrolled 7/1/12 to 6/30/15), ‘12’ (ATB-Test Completed-1st Enrolled 7/1/15...
or After), ‘13’ (ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15), and ‘14’ (ATB-College Credits-1st Enrolled 7/1/15 or After).

14. Beginning in October 2015, the COD System no longer accepts Student Eligibility Code of ‘08’ (State Auth. H.S. Equivalent Certificate) for all award years and instead will capture the “State Authorized High School Equivalent Certificate” under value ‘07’ (GED) which is renamed (GED or State Authorized High School Equivalent Certificate). The COD System will reject a value of ‘06’ or ‘07’ with reject edit 198 for Award Years 2012-2013 and prior. The COD System will reject a value of ‘09’, ‘10’, ‘11’, ‘12’, ‘13’, and ‘14’ with reject edit 198 for Award Years prior to 2015-2016.

The following table includes the valid completion date for each of the Ability to Benefit Test Codes:

<table>
<thead>
<tr>
<th>Test Code</th>
<th>Description</th>
<th>Valid Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>01 – ASSET</td>
<td>ASSET Program: Basic Skills Test</td>
<td>November 1, 2002 to October 31, 2015</td>
</tr>
<tr>
<td>02 – CPAt</td>
<td>Career Programs Assessment (CPAt) Basic Skills Subtests</td>
<td>November 1, 2002 to June 30, 2015</td>
</tr>
<tr>
<td>03 – CELSA</td>
<td>Combined English Language Skills Assessment</td>
<td>November 01, 2002 to Present</td>
</tr>
<tr>
<td>04 – COMPASS</td>
<td>COMPASS Subtests</td>
<td>November 1, 2002 to October 31, 2015</td>
</tr>
<tr>
<td>05 – CPTs/ACCUPLACER</td>
<td>Computerized Placement Tests (CPTs)/ACCUPLACER</td>
<td>November 01, 2002 to Present</td>
</tr>
<tr>
<td>06 – DTLs/DTMS</td>
<td>Descriptive Tests: Language Skills and Mathematical Skills</td>
<td>November 01, 2002 to April 27, 2007</td>
</tr>
<tr>
<td>08 – WBST</td>
<td>Wonderlic Basic Skills Test</td>
<td>November 01, 2002 to Present</td>
</tr>
<tr>
<td>09 – WorkKeys</td>
<td>WorkKeys Program</td>
<td>March 11, 2005 to June 30, 2015</td>
</tr>
<tr>
<td>10 – TABE</td>
<td>Test of Adult Basic Education</td>
<td>November 01, 2002 to May 11,2004</td>
</tr>
<tr>
<td>11 – SABE</td>
<td>Spanish Assessment of Basic Education</td>
<td>November 1, 2002 to October 31, 2015</td>
</tr>
<tr>
<td>12 – WBST-Spanish</td>
<td>Wonderlic Basic Skills Test – Spanish</td>
<td>July 1, 2015 to Present</td>
</tr>
</tbody>
</table>

Enrollment School Code Field

With Award Year 2012-2013 and forward, the COD System added the <EnrollmentSchoolCode> tag as a required tag in the Disbursement block for all Direct Loan, TEACH Grant, and Pell Grant awards. The Enrollment School Code is defined as the 8-digit OPE ID of the physical location where a student is attending classes. The COD System’s processing rules for the <EnrollmentSchoolCode> tag will differ by award type. The <EnrollmentSchoolCode> tag will be stored for accepted Direct Loan, Pell Grant, and TEACH Grant awards. If
submitted, the `<EnrollmentSchoolCode>` tag will be returned on Common Record Responses for all programs.

**Business Rules**

1. For Award Year 2012-2013 and forward, the COD System will accept the `<EnrollmentSchoolCode>` tag.

2. The `<EnrollmentSchoolCode>` tag will be returned on Common Record Responses.

3. The COD System will verify that the `<EnrollmentSchoolCode>` tag is the correct format of eight numeric digits for all awards.

4. The COD System will also verify that the `<EnrollmentSchoolCode>` tag is an existing OPE ID for all Direct Loan, Pell and TEACH awards.

5. Origination
   a. The `<EnrollmentSchoolCode>` will be required on origination for Direct Loan, Pell and TEACH awards.
   b. For Pell originations without disbursements, the `<EnrollmentSchoolCode>` tag will not be required.

6. Change
   a. The COD System will update the `<EnrollmentSchoolCode>` if a change is submitted on Direct Loan, Pell and TEACH awards.
   b. The `<EnrollmentSchoolCode>` will not be required on changes to actual and anticipated disbursements already existing on the COD System.
   c. The disbursement sequence number must be incremented to change the `<EnrollmentSchoolCode>` on an actual disbursement.
   d. The disbursement sequence number will not have to be incremented to change the `<EnrollmentSchoolCode>` on an anticipated disbursement.

7. The COD system will create a new event when the `<EnrollmentSchoolCode>` tag is updated on Direct Loan, Pell, or TEACH changes.

8. The `<EnrollmentSchoolCode>` tag will be required on award changes when a new disbursement is submitted for all Direct Loan, Pell, and TEACH submissions.
   a. The `<EnrollmentSchoolCode>` tag will not be required on disbursement changes to an existing funded or anticipated disbursement for these awards.
   b. The `<EnrollmentSchoolCode>` tag will be updated when a school submits a change on these awards.
Direct Loan Award and Disbursement Process

Utilizing Award Key for Subsidized and Unsubsidized Loans

The Award Key is a shortcut to avoid multiple submissions of tags where data is consistent across loans for a single borrower. This reference structure allows for more efficient transmission of loan information. Loan information that could be reported for multiple loans is “pulled up” to allow for a repeatable complex element.

Business Rules

1. There are two reference tags in the Common Record identified as Award Key:
   a. The first tag is an attribute for DL Loan Information,
      <DLLoanInformation AwardKey="1">   
   b. The second tag is a simple element, <AwardKey>.

2. Both of these reference tags are required when submitting Direct Loan Award information.

3. These two reference tags link two sections of loan information together, expediting the reporting of similar data across Subsidized and Unsubsidized loans for a single borrower.

4. An Award Key number is referenced once but can be used by multiple Subsidized and Unsubsidized loans within the same submission. *Please see Example 1.*

5. It is permissible to send a unique Award Key for each Subsidized and Unsubsidized loan. *Please see Example 2.*

6. An Award Key references the following data elements shared by Subsidized and Unsubsidized loans:
   a. Origination Fee Percent,  
      <OriginationFeePercent>
   b. Interest Rebate Percent, <InterestRebatePercent>
   c. Promissory Note Print Code,  
      <PromissoryNotePrintCode>
   d. Disclosure Statement Print Code,  
      <DisclosureStatementPrintCode>
   e. Student Level Code, <StudentLevelCode>
   f. Financial Award Begin Date,  
      <FinancialAwardBeginDate>

Award Key Uniqueness

A PLUS loan within the same submission must have a unique Award Key number as some of the shared data elements in DL Loan Information always have different values for PLUS. Origination Fees for Subsidized, Unsubsidized, and PLUS loans may vary.
g. Financial Award End Date, 
   <FinancialAwardEndDate>

h. Academic Year Begin Date, 
   <AcademicYearBeginDate>

i. Academic Year End Date, <AcademicYearEndDate>

7. An Award Key number may only be referenced within that Common Record. The Direct Loan Information Award Key number is not stored on the COD System and, therefore, the Award Key number cannot be used in a subsequent Common Record to reference data submitted in the DL Loan Information block of a prior Common Record.

**Example 1: One Award Key**

In this example, there is one Award Key. The AwardKey = "1" can be used for a Subsidized and Unsubsidized loan. If this student submission also included a PLUS loan, this same AwardKey = "1" could not be used for a PLUS loan. Since the information in AwardKey = "1" is not applicable to the PLUS loan (such as the origination fee), the PLUS loan must have a unique Award Key such as AwardKey = "2".

Below is the content of DL Loan Information and of the DL Subsidized and DL Unsubsidized complex elements:

```xml
<DLLoanInformation AwardKey="1">
   <OriginationFeePercent>1</OriginationFeePercent>
   <InterestRebatePercent>0</InterestRebatePercent>
   <PromissoryNotePrintCode>O</PromissoryNotePrintCode>
   <DisclosureStatementPrintCode>Y</DisclosureStatementPrintCode>
   <StudentLevelCode>1</StudentLevelCode>
   <FinancialAwardBeginDate>2021-09-01</FinancialAwardBeginDate>
   <FinancialAwardEndDate>2022-05-15</FinancialAwardEndDate>
   <AcademicYearBeginDate>2021-09-01</AcademicYearBeginDate>
   <AcademicYearEndDate>2022-05-15</AcademicYearEndDate>
</DLLoanInformation>

<DLSubsidized>
   <AwardKey>1</AwardKey>
   <FinancialAwardYear>2022</FinancialAwardYear>
   <CPSTransactionNumber>4</CPSTransactionNumber>
   <FinancialAwardAmount>2625</FinancialAwardAmount>
   <DependencyStatusCode>D</DependencyStatusCode>
   <FinancialAwardNumber>1</FinancialAwardNumber>
   <FinancialAwardID>123456789S22G12345001</FinancialAwardID>
   <FinancialAwardCreateDate>2022-07-01</FinancialAwardCreateDate>
   <StudentEligibilityCode>07</StudentEligibilityCode>
</DLSubsidized>

<DLUnsubsidized>
   <AwardKey>1</AwardKey>
   <FinancialAwardYear>2022</FinancialAwardYear>
   <CPSTransactionNumber>4</CPSTransactionNumber>
   <FinancialAwardAmount>1000</FinancialAwardAmount>
   <DependencyStatusCode>D</DependencyStatusCode>
   <FinancialAwardNumber>1</FinancialAwardNumber>
   <FinancialAwardID>123456789U22G12345001</FinancialAwardID>
   <FinancialAwardCreateDate>2021-07-01</FinancialAwardCreateDate>
   <StudentEligibilityCode>07</StudentEligibilityCode>
   <AdditionalUnsubsidizedEligibilityIndicator>true</AdditionalUnsubsidizedEligibilityIndicator>
</DLUnsubsidized>
```
In this example, all of the Award Key content equals one. Therefore, the COD System knows the information in <DLLoanInformation> can be used for both the <DLSubsidized> and <DLUUnsubsidized>.

**Example 2: Separate Award Keys for Sub, Unsub Loans**

In this example, there are two Award Keys. The AwardKey = "1" is used for the Subsidized loan and the AwardKey = "2" is used for the Unsubsidized loan. If this student submission also included a PLUS loan, the PLUS loan requires a unique Award Key that is not equal to 1 or 2 (which could be AwardKey = "3").

Below is the content of DLLoanInformation for a student receiving a Subsidized and an Unsubsidized loan where a unique Award Key is used for each loan.

```
<DLLoanInformation AwardKey="1">
    <OriginationFeePercent>1</OriginationFeePercent>
    <InterestRebatePercent>0</InterestRebatePercent>
    <PromissoryNotePrintCode>S</PromissoryNotePrintCode>
    <DisclosureStatementPrintCode>Y</DisclosureStatementPrintCode>
    <StudentLevelCode>1</StudentLevelCode>
    <FinancialAwardBeginDate>2021-09-01</FinancialAwardBeginDate>
    <FinancialAwardEndDate>2022-05-15</FinancialAwardEndDate>
    <AcademicYearBeginDate>2021-09-01</AcademicYearBeginDate>
    <AcademicYearEndDate>2022-05-15</AcademicYearEndDate>
</DLLoanInformation>

<DLLoanInformation AwardKey="2">
    <OriginationFeePercent>1</OriginationFeePercent>
    <InterestRebatePercent>0</InterestRebatePercent>
    <PromissoryNotePrintCode>O</PromissoryNotePrintCode>
    <DisclosureStatementPrintCode>Y</DisclosureStatementPrintCode>
    <StudentLevelCode>1</StudentLevelCode>
    <FinancialAwardBeginDate>2021-09-01</FinancialAwardBeginDate>
    <FinancialAwardEndDate>2022-05-15</FinancialAwardEndDate>
    <AcademicYearBeginDate>2021-09-01</AcademicYearBeginDate>
    <AcademicYearEndDate>2022-05-15</AcademicYearEndDate>
</DLLoanInformation>

<DLSubsidized>
    <AwardKey>1</AwardKey>
    <FinancialAwardYear>2022</FinancialAwardYear>
    <CPSTransactionNumber>4</CPSTransactionNumber>
    <FinancialAwardAmount>2625</FinancialAwardAmount>
    <DependencyStatusCode>D</DependencyStatusCode>
    <FinancialAwardNumber>1</FinancialAwardNumber>
    <FinancialAwardID>123456789S22G12345601</FinancialAwardID>
    <FinancialAwardCreateDate>2021-07-01</FinancialAwardCreateDate>
    <StudentEligibilityCode>07</StudentEligibilityCode>
    <Disbursement Amount="1000"/></Disbursement>
    <DisbursementDate>2021-10-13</DisbursementDate>
    <DisbursementReleaseIndicator>true</DisbursementReleaseIndicator>
    <DisbursementSequenceNumber>2</DisbursementSequenceNumber>
    <EnrollmentSchoolCode>12345678</EnrollmentSchoolCode>
</DLSubsidized>
```
In this example, the DLSubsidized and DLUnsubsidized have unique Award Key content. Therefore, the DLLoanInformation cannot be “pulled up” and the DLLoanInformation complex element is submitted twice with information for each loan.

**Disbursement Sequence Number Required on all Disbursements**

A Disbursement Sequence Number must be reported for all disbursements. This is an indicator of a single transaction associated with a specific disbursement number.

**Business Rules**

1. The Disbursement Sequence Number determines the order in which the transaction must be processed for a given Disbursement Number.

2. The Disbursement Sequence Number must be reported in an incremental, ascending order.

3. The Disbursement Sequence Number valid values range from 1-99.
a. Disbursement Sequence Numbers 1-65 are reported by schools.

b. Disbursement Sequence Numbers 66-90 are reserved for COD system-generated adjustments to disbursements, COD web generated disbursements, and anticipated/actual disbursement information submitted online via the COD Web site.

c. Disbursement Sequence Numbers 91-99 are reserved for Direct Loan Payment to Servicer transactions (in descending order).

4. The Disbursement Sequence Number must be reported as 1 when the Disbursement Release Indicator is set to false.

5. The Disbursement Sequence Number must be set to 1 the first time the disbursement is reported with the Disbursement Release Indicator set to true.

6. Duplicate Disbursement Sequence Numbers for the same Disbursement Number when the Disbursement Release Indicator is set to true are considered duplicate disbursement transactions.

7. When resubmitting a disbursement transaction that was rejected, the resubmission must use the same Disbursement Sequence Number that was rejected.

8. The &lt;DisbursementSequenceNumber&gt; tag is returned in the disbursement response complex element in all Full or Standard Common Record Responses.

9. The &lt;PreviousSequenceNumber&gt; tag is returned in all Common Record disbursement response complex elements with Disbursement Sequence Number greater than 01, including COD system-generated ND, PS, and WB responses, to indicate the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

**Disbursement Release Indicator**

The Disbursement Release Indicator tag is used to identify disbursements that have been made or will be made in the near future to the student/borrower, and that are used to substantiate cash that has been drawn down or may lead to a change in the Current Funding Level (CFL).

**Business Rules**

1. Disbursement information is submitted to the COD System with a Disbursement Release Indicator equal to true or false.
a. Disbursements with a Disbursement Release Indicator set to false do NOT change the CFL. False indicates anticipated disbursement information.

b. Disbursements with a Disbursement Release Indicator set to true may change the CFL. True indicates actual disbursement information.

c. If the Disbursement Release Indicator is omitted from the Common Record, the COD System sets it to false.

2. Depending on the school’s Cash Monitoring status, the COD System may accept Disbursement information with Disbursement Release Indicator set to true in advance of, on, or after the disbursement date.

3. If the Disbursement Release Indicator is set to true, the disbursement is processed only if the required tags in the Disbursement complex element are complete.

4. The Disbursement Release Indicator cannot be changed from true to false.

5. Disbursement information with a Disbursement Release Indicator set to true is not accepted more than 7 calendar days before the disbursement date. Disbursement information submitted 7 days or less before the disbursement date may result in a change to the School’s Current Funding Level (CFL).

6. To make an adjustment to an accepted and posted actual disbursement, the Disbursement Release Indicator must be set to true.

7. The Disbursement Release Indicator can be updated and disbursements can be generated, updated and adjusted on the COD Web site.

**Establishing an Initial Direct Loan Award**

Disbursement information is required when creating all initial Direct Loan awards (Subsidized, Unsubsidized and PLUS) on the web or by Common Record submission to the COD System. Disbursement information is required on initial Direct Loan awards in order to produce accurate Disclosure Statements and to calculate the repayment period for PLUS borrowers.

**Business Rules**

1. A person is not established on the COD System if an award rejects that contains a new student identifier or a change to a student identifier.
2. The award is not linked to an MPN if the award rejects when establishing an initial Direct Loan award.

3. A complete address is required; however it does not have to be submitted if it is found and pulled from the CPS or COD database.
   a. The data elements for a complete address are:
      i. Address, <AddressLine>
      ii. City, <AddressCity>
      iii. State/Province Code <StateProvinceCode>
      iv. Postal Code, <PostalCode>
      v. Country Code, <AddressCountryCode> (for international addresses only)
   b. If any of the address fields are blank, COD will attempt to pull the entire address from CPS or the COD database.
      i. The COD System will pull the student address for the highest CPS transaction number for the most recent award year.
      ii. If a complete address cannot be found on CPS or the COD database, the record will reject (Edit 021).
         1. The school must resubmit the record with a complete address.
   c. If a complete address is found on CPS or the COD database, the record will accept and the school will receive a warning message that a complete address exists on COD (Edit 120).
   d. Warning edit 214 will be triggered on the borrower level if a domestic address is not submitted in the Permanent or Alternates Address country block on origination or maintenance of a Direct PLUS loan.

4. The Dependency Status tag is a required field for all Direct Loan Subsidized and Unsubsidized originations.
   a. The Dependency Status tag is not required for award change records.

5. The Additional Unsubsidized Indicator is a required field for all Direct Loan Unsubsidized originations.
   a. The Additional Unsubsidized Indicator is not a required field for award change records.
6. A PLUS award will be built on the COD System when submitted regardless of the credit check decision, as long as the award is submitted with anticipated disbursement records (DRI equal to `false`).

   a. If the PLUS award is submitted with actual disbursements and the credit decision is denied or pending, the award will be rejected. In addition, changes to award information and student borrower identifiers will be rejected. Note: The COD System will allow the award amount and disbursement amount(s) to be reduced to zero. In these cases, all required tags to originate an award must be submitted.

7. The COD System requires submission of all disbursement information when establishing an award via the Common Record or the COD Web site. Required disbursement information includes:

   a. All anticipated disbursements (Disbursement Release Indicator = `false`)

   OR

   b. All actual disbursements (Disbursement Release Indicator = `true`)

   OR

   c. A combination of actual disbursements (Disbursement Release Indicator = `true`) and anticipated disbursements (Disbursement Release Indicator = `false`)

8. The following disbursement level data elements are required for establishing a Direct Loan award:

   a. Disbursement Date

   b. Disbursement Number

   c. Disbursement Sequence Number

   d. Disbursement Amount

   e. Disbursement Fee Amount

   f. Interest rebate Amount

   g. Disbursement Net Amount

   h. Disbursement Release Indicator

---

**Published Program Length**

One of these three tags should be reported: Published Program Length Years, Published Program Length Months, or Published Program Length Weeks. If more than one of the elements is reported the system will reject with the new reject edit 202.
i. Enrollment Status
j. Program CIP Code
k. Payment Period Start Date
l. Enrollment School Code
m. Published Program Length Years
n. Published Program Length Months
o. Published Program Length Weeks
p. Weeks Programs Academic Year
q. Special Programs
r. Program Credential Level

9. Schools cannot submit a single disbursement equal to the award amount unless the school meets one of the multiple disbursement exemption criteria. Exemptions include:

a. A single disbursement equal to the award amount may be made for a loan for a student in an eligible study abroad program, regardless of the length of the loan period, if the school's most recently calculated Stafford loan default rate is less than 5 percent for the single most recent fiscal year for which data is available.

10. The COD System compares the sum of the disbursements (anticipated and/or actual) to the Award Amount.

a. If the sum of the disbursements does not equal the Award Amount, the award rejects with error code 117.

11. The entire award rejects with error code 117 if any disbursements (anticipated or actual) reject, or if all disbursement information is not included in the origination.

12. A maximum of twenty disbursements are allowed on each distinct PLUS loan.

**Submitting Direct Loan Anticipated Disbursement Information**

Direct Loan Anticipated Disbursement information can be submitted using the Common Record to the COD System to originate a loan. Complete disbursement information is required when originating all Direct Loan awards. Complete disbursement information can include anticipated disbursements, actual disbursements, or a combination of anticipated and actual disbursements. When anticipated disbursement...
information is sent, disbursement edits are performed, the COD System can generate Disclosure Statements, when appropriate, and anticipated disbursements are reflected on the Pending Disbursement List report.

**Business Rules**

1. Anticipated Disbursement information with a Disbursement Release Indicator set to `false` indicates anticipated disbursements.

2. Complete disbursement information is required when establishing a Direct Loan award. The sum of all disbursements (anticipated and/or actual) must equal the Award Amount.

3. The Response from a Record containing Anticipated Disbursement information for a Subsidized and Unsubsidized loan provides the MPN Status and MPN Indicator.

4. Anticipated Disbursement information is processed by the COD System and serves as an early detection for any edit issues, which may cause the record to reject at the time of disbursement. For example, the student identifier match with the CPS is performed at the Person and Award level if these are not accepted then the disbursement will reject.

5. Including disbursement information with a Disbursement Release Indicator set to `false` allows for the timely generation of Disclosure Statements and the calculation of the repayment period for PLUS borrowers.

**Generating Disclosure Statements**

Disclosure Statements are generated for subsidized, unsubsidized and PLUS loans.

**Business Rules**

1. COD generates Disclosure Statements for all loan types (subsidized, unsubsidized and PLUS loans).

2. Disclosure Statement Print Code is a data element on the Common Record indicating whether the school or COD sends the Disclosure Statement.

3. The valid values for the Disclosure Statement Print Code are:

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Y</td>
<td>COD prints and sends to borrower</td>
</tr>
<tr>
<td>R</td>
<td>COD reprint</td>
</tr>
<tr>
<td>S</td>
<td>School Prints and Sends to Borrower</td>
</tr>
</tbody>
</table>

4. The COD System does NOT send a Disclosure Statement when the Disclosure Statement Print Code on the
Common Record has a value of $S$ (School prints and sends to borrower).

5. If an award does not contain the Disclosure Statement Print Code, the COD System defaults to the option on the school profile when processing the award.

6. Disclosure Statements sent by a school must be generated on the approved Disclosure Statement form.

a. When printing the Disclosure Statement, it is recommended to use Courier, 10 point, 12 pitch font.

7. The party (school or COD) who is responsible for generating and sending the Disclosure Statement is also responsible for generating and sending the Plain Language Disclosure Statement, when the Disclosure Statement is for a subsequent loan under an MPN.

8. Disclosure Statements must be provided to the Student borrower (for Subsidized and Unsubsidized) or Parent or Graduate Student borrower (for PLUS) before or at the time of the first disbursement.

9. The COD System does NOT send a Disclosure Statement for a PLUS award until the award has an approved credit decision.

10. For Subsidized and Unsubsidized loans, the COD System generates a Disclosure Statement 7 calendar days before the first disbursement date.

11. For PLUS loans, the COD System generates a Disclosure Statement 7 calendar days before the first disbursement date, if there is an approved credit decision.

12. If the disbursement information is submitted to the COD System less than 7 calendar days before the first disbursement date, the Disclosure Statement is generated immediately, unless the School indicated that it provided the Disclosure Statement.

13. The COD System generates and sends a Disclosure Statement for a PLUS award upon receipt of an approved credit decision if the 7-day criterion has passed, unless the Disclosure Statement Print Code on the award or the school’s print profile indicates that the school provides the Disclosure Statement.

14. The COD System generates and sends a Disclosure Statement unless the school’s print profile indicates that the school provides the Disclosure Statement. The Disclosure statement is printed only once for each loan unless the school requests a reprint.


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**Omitting the Disclosure Statement Print Code**

For more information please refer to the Disclosure Statement Print Option topic.

**eCorrespondence**

Borrowers can choose to receive COD generated correspondence and Servicer correspondence electronically. Borrowers sign up for this service on StudentAid.gov. Borrowers who do not choose to receive correspondence electronically will receive correspondence through the U.S. Postal Service.
16. The COD System does NOT automatically reprint Disclosure Statements when changes to the Award Amount, Disbursement Dates, or Disbursement Amounts are received.

17. When a Disclosure Statement is reprinted, the data printed on the statement is the current data in the COD System and may not match the original disclosure statement.

18. When a request is received to reprint the Disclosure Statement for a subsequent award under an MPN, the school or COD System, depending on who has responsibility for printing the Disclosure Statement, reprints the Plain Language Disclosure.

19. The COD system requires schools to provide all disbursement information prior to disbursement.

### Printing Disclosure Statements Based on School Options and Disclosure Statement Print Code

<table>
<thead>
<tr>
<th>School Option set within COD System</th>
<th>Disclosure Statement Print Code</th>
<th>COD System Prints</th>
</tr>
</thead>
<tbody>
<tr>
<td>School prints</td>
<td>Null or No tag</td>
<td>NO</td>
</tr>
<tr>
<td>School prints</td>
<td>S (School prints)</td>
<td>NO</td>
</tr>
<tr>
<td>School prints</td>
<td>Y (COD prints and sends to borrower)</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>R (COD reprint)</td>
<td>YES</td>
</tr>
<tr>
<td>COD prints</td>
<td>Null or no tag</td>
<td>YES</td>
</tr>
<tr>
<td>COD prints</td>
<td>S (School prints)</td>
<td>NO</td>
</tr>
<tr>
<td>COD prints</td>
<td>Y (COD prints and sends to borrower)</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>R (COD reprint)</td>
<td>YES</td>
</tr>
</tbody>
</table>

### When COD Prints a Disclosure Statement based on receipt of Disbursement Information

<table>
<thead>
<tr>
<th>Disb. Info Submitted</th>
<th>Date Disbursement Info Submitted</th>
<th>Disbursement Release Indicator</th>
<th>Disbursement Date</th>
<th>Disclosure Statement Generated by COD</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 calendar days prior to first disbursement</td>
<td>09-03-2012</td>
<td>true or false</td>
<td>09-10-2012</td>
<td>09-03-2012</td>
</tr>
<tr>
<td>On Disbursement Date</td>
<td>09-10-2012</td>
<td>true or false</td>
<td>09-10-2012</td>
<td>09-10-2012</td>
</tr>
</tbody>
</table>

The COD System performs annual Loan Limit edits at both the award and disbursement levels. The applicable loan limit is determined by the Earliest Disbursement Date for that award, as well as grade level, loan type, dependency status and flags, such as the Additional Unsubsidized Indicator (AUI), Health Professions (HPPA) and Preparatory Coursework for Admission to a Graduate/Professional program/Teacher Certification (PPCI).

If the Health Professions (HPPA) flag is set to "Y", please refer to the HPPA Loan Limit column. HPPA only applies to Domestic Schools.
For Direct Loans first disbursed on or after July 1, 2012, the following loan limits apply:

### Direct Loan Limits

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Subsidized Loan Limit</th>
<th>Combination Base Loan Limit</th>
<th>Additional Unsubsidized Loan Limit</th>
<th>PPCI Loan Limit</th>
<th>HPPA Loan Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 or 1</td>
<td>$3,500</td>
<td>$5,500</td>
<td>$9,500</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>$4,500</td>
<td>$6,500</td>
<td>$10,500</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3, 4, 5</td>
<td>$5,500</td>
<td>$7,500</td>
<td>$12,500</td>
<td>$12,500</td>
<td></td>
</tr>
<tr>
<td>6 or 7</td>
<td>0</td>
<td>$8,500</td>
<td>$20,500</td>
<td></td>
<td>$47,167</td>
</tr>
</tbody>
</table>

Note: Beginning July 1, 2012, Graduate and Professional students (Grade Level 6 and 7) will no longer be eligible to receive Direct Loan Subsidized awards with an Award Begin Date on or after 7/1/12.

### Award Level Editing

#### Informed Borrowing

Beginning with 2020-2021 award year, borrowers may acknowledge on StudentAid.gov that they have reviewed their outstanding loan balance or if they have no loan balance, the average loan balance at the school they plan to attend.

#### Business Rules

1. The COD System will include the Informed Borrowing fields in the Direct Loan Award Level Response block. The COD System will send the following tags:
   - InformedBorrowingComplete>
   - <InformedBorrowingCompletionDate>
   - <InformedBorrowingID>
2. Applies to Direct Subsidized, Direct Unsubsidized and Direct PLUS Loans
   - This will be applicable to undergraduate students receiving Direct Subsidized and Direct Unsubsidized Loans
   - This will be applicable to graduate students receiving Direct Unsubsidized and Direct PLUS Loans
   - This will be applicable to parents borrowing Direct PLUS Loans for dependent undergraduate students
3. The COD System will ignore these tags if included in the common record (i.e. inbound) file

### Subsidized Loan Limit

If the cumulative Subsidized award amount exceeds the Subsidized Loan Limit, Reject Edit 167 will be triggered and COD will reject the award. Edit 167 is performed on all Subsidized awards regardless of a student’s Dependency Status or Additional Unsubsidized Indicator value on other applicable awards.
**Combination Base Loan Limit**

The Combination Base Loan Limit is enforced when all of the conditions are met:

- The student has a Dependent Status on all applicable awards
- The student has an Unsubsidized Direct Loan award
- All applicable Unsubsidized awards have an AUI = ‘false’

If an award is submitted that will cause the cumulative award amount of all applicable Subsidized and/or Unsubsidized awards at a single school to exceed the Dependent Combination Base Loan Limit at the highest applicable Grade Level, Edit 157 will be triggered.

**Additional Unsubsidized Loan Limit**

The Additional Unsubsidized Loan Limit is enforced when at least one of the conditions are met:

- The student is Independent
- The student has an applicable award with an Additional Unsubsidized Indicator = ‘true’
- Student has an Unsubsidized DL award.

Edit 039 will continue to be triggered when an award is submitted that will cause the cumulative award amount of all applicable Subsidized and/or Unsubsidized awards at a single school to exceed the Additional Unsubsidized Loan Limit at the highest applicable Grade Level.

**Business Rules for All Loan Limit Editing at the Award Level**

1. The COD System performs the award level edit when a loan is being established or updated. This includes the following actions:
   
   a. Upward adjustment to Award Amount
   b. Change to Academic Begin and/or End Dates
   c. Change to Grade Level
   d. Change to Health Professions flag
   e. Change to PPCI flag
   f. Earliest Disbursement Date
   g. Dependency Status Code
   h. Additional Unsubsidized Indicator Grade Level

2. The COD System uses the incoming loan as the basis for selecting other loans on the system to use in the loan limit
calculation. The system uses the following criteria when selecting these loans:

a. Earliest Disbursement Date
   i. This will be used to determine the set of loan limits that are applicable

b. Subsidized or Unsubsidized loans

c. Loans were received at the same attended school

d. Loans belong to the same student

e. Loans have award amounts greater than 0

f. The Academic Year Start and End Dates of the incoming loan
   i. Wholly contain the Academic Year of the other loan
   ii. Are wholly within the Academic Year of the other loan or
   iii. Are equal to the Academic Year dates of the other loan

g. The COD System excludes any discharged amounts or payments to Servicing within 120 days of disbursement from the calculation.

h. The COD System uses Dependency Status and the Additional Unsubsidized Indicator to determine which loan limit edit to apply.

3. COD will use correcting edit 219 to reduce an award amount to be equal to the sum actual and anticipated disbursements
   a. Correcting Edit 219 will be returned on the <FinancialAwardAmount> tag
   b. The corrected value will be included in the <ResponseErrorValue> tag.
   c. The edit will only trigger for Award Years 2016-2017 and forward
   d. The following is an XML example of what may be included in the response block:

```
<Response>
  <ResponseCode>C</ResponseCode>
  <EditProcessResult>
    <ResponseErrorCode>219</ResponseErrorCode>
    <ResponseErrorField>FinancialAwardAmount</ResponseErrorField>
    <ResponseErrorValue>2000</ResponseErrorValue>
  </EditProcessResult>
```

In October 2016, COD introduced correcting edit logic to the Direct Loan program. Schools do not have the option to select between ‘correcting’ or ‘rejecting’ processing options for the Direct Loan program.
Business Rules for Loan Limit Editing at the Award Level: For Dependent Students Not Receiving an Additional Unsubsidized Amount (Edit 157)
The following applies to dependent students who aren’t receiving an additional unsubsidized amount. For these students, the annual loan limit edit (Edit 157) is run to ensure that the students combined Subsidized/Unsubsidized awards don’t exceed the Dependent Combination Base Loan Limit for the academic year.

1. If the Dependency Status is “D” and the Additional Unsubsidized Indicator is false on all awards in the applicable loan range, the COD System determines whether the student exceeds the Dependent Combination Base Loan Limit at the Attended School on the incoming record.
   a. The COD System determines whether the loan amount on the incoming record will cause the student to exceed the maximum Base Annual Limit for the highest student level reported for the selected loans or incoming loan.
   b. The COD System uses both subsidized and unsubsidized loans when determining whether the incoming record will cause the student to exceed the Base Annual Limit.

Business Rules for Loan Limit Editing at the Award Level: For Independent Students and Dependent Students Eligible for and Receiving an Additional Unsubsidized Amount (Edit 39)
The following applies to independent students and dependent students who are receiving an additional unsubsidized amount. For these students, the annual loan limit edit is to ensure that the student’s combined Subsidized/Unsubsidized awards don’t exceed the Maximum Combined Limit for the academic year.

1. If the Dependency Status is “I” and the Additional Unsubsidized Indicator is false OR the Dependency Status is “D” and the Additional Unsubsidized Indicator is true on any selected award, the COD system determines whether or not the loan amount on the incoming record will cause the student to exceed his/her Base Annual Loan Limit at the attended school.
   a. The COD System determines whether the loan amount on the incoming loan will cause the student to exceed the maximum Subsidized amount for the highest student level reported for the selected loans or incoming loan.
b. The COD System uses only subsidized loans when determining whether the incoming record will cause the student to exceed the maximum Subsidized amount.

c. The COD System uses the Subsidized Loan Limit as the maximum Subsidized amount.

2. If the Dependency Status is “I” and the Additional Unsubsidized Indicator is false OR the Dependency Status is “D” and the Additional Unsubsidized Indicator is true, the COD System determines whether the loan amount on the incoming record will cause the student to exceed the highest Additional Unsubsidized Loan Limit (base plus additional unsubsidized amounts) for the loans included in the calculations. The highest loan limit is determined by looking at the student level code, the Health Professions flag, the PPCI flag, and Earliest Disbursement Date for the selected loans for incoming loan.

**Disbursement Level Editing**

If an actual disbursement on a subsidized award will cause the Subsidized Loan Limit to be exceeded, Edit 167 will be returned Edit 039 will continue be triggered if the sum of all actual disbursements across schools for both Subsidized and Unsubsidized awards exceed the Additional Unsubsidized Loan Limits.

**Business Rules for Disbursement Level Editing**

1. The COD system performs at the disbursement level when the actual disbursement is submitted OR the actual disbursement is increased and the student attends more than one school.

   a. Establish a new actual disbursement

   b. Upward adjustment to Disbursement Amount

   c. Change to Academic Begin and/or End Dates

   d. Change to Grade Level

   e. Change to Health Professions Flag

   f. Change to PPCI Flag

   g. Earliest Disbursement Date

2. The COD System uses the incoming loan as the basis for selecting other loans on the system to use in the loan limit calculation. The system uses the following criteria when selecting these loans:

   a. Earliest Disbursement Date
i. This will be used to determine the set of loan limits that are applicable

b. Subsidized or Unsubsidized loans

c. Loans received at any attended school

d. Loans belong on the same student

e. Loans have award amounts greater than 0

f. The Academic Year Start and End Dates of the incoming loan

i. Wholly contain the Academic Year of the other loan

ii. Are wholly within the Academic Year of the other loan or

iii. Are equal to the Academic Year dates of the other loan

3. The COD System determines whether or not the disbursement amount on the loan incoming record will cause the student to exceed his/her annual loan limit across all attended schools.

a. The COD System determines whether the disbursement amount on the incoming record will cause the student to exceed the maximum Subsidized amount for the highest student level reported for the selected loans or incoming loan.

i. The COD System uses only actual disbursements for subsidized loans when determining whether the incoming record will cause the student to exceed the maximum Subsidized amount.

ii. The COD System uses the Annual Base Amount as the maximum Subsidized amount.

b. The COD System determines whether the disbursement amount on the incoming record will cause the student to exceed the highest maximum combined amount (base plus additional unsubsidized amounts) for the loans included in the calculations. The highest loan limit is determined by looking at the student level code, the Health Professions flag, the PPCI flag, and Earliest Disbursement Date for the selected loans or incoming loan.

c. The COD System excludes any discharged amounts or payments to Servicing made within 120 days of disbursement from the calculation.
Direct Loan Award and Disbursement Process

June 2021

2021-2022 COD Technical Reference
Volume II – Common Record Technical Reference

Submit Direct Loan Disbursement Information and Disbursement Release Indicator

The COD System can accept Direct Loan Disbursement information in advance, on or after the Disbursement Date.

Business Rules

1. The COD System accepts disbursement information in advance of, on or after the disbursement date.

2. The COD System will only accept an actual disbursement if an accepted MPN exists on the COD System linked to the associated Direct Loan award.

3. Disbursement Date is the date the money was credited to the student’s account or paid to the student (or borrower, if PLUS loan) directly for a specific disbursement number. Disbursement Date is not the date of the adjustment transaction. The Disbursement Date is submitted on a Disbursement transaction as well as on an Adjusted Disbursement Amount transaction.

4. Disbursement information must be submitted in compliance with the 15-day reporting regulation.
   a. All data necessary to book a loan or subsequent disbursement must be reported within 15 days of the actual disbursement date.
   b. Adjustments to disbursement amounts should be reported within 15 days of the date the adjustment occurred, which may or may not be within 15 days of the actual disbursement date reported in the record.

5. Schools will receive Warning Edit 055 “Disbursement Information Received 30 Days or More After Date of Disbursement” in the following conditions;
   a. Disbursement Sequence Number = 1
      AND
   b. Disbursement Information received and processed more than 30 days later than the Disbursement Date reported on the record,
      AND
   c. Disbursement Release Indicator = true

Note: While Warning Edit 055 looks at actual disbursement records submitted more than 30 days

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d. The COD System uses the gross amount $<\text{DisbursementAmount}>$ for the actual disbursements reported for the loans selected.
after the actual Date of Disbursement, regulations require schools to submit all actual disbursements to the Department within 15 days of the actual disbursement date.

6. Disbursement information is submitted to the COD System with a Disbursement Release Indicator equal to true or false.

   a. A Disbursement Release Indicator = false (submit anticipated disbursement information). False indicates anticipated disbursement information and functions like an origination record.

   b. A Disbursement Release Indicator = true. True indicates actual disbursement information.

   c. If the Disbursement Release Indicator is omitted from the Common Record, the COD System sets it to false.

7. A Disbursement Release Indicator = false can be updated to true on a Direct Loan disbursement.

8. A Disbursement Release Indicator = true cannot be updated to false on a Direct Loan disbursement.

9. Disbursement Release Indicator can be updated and disbursements can be generated, updated and adjusted on the COD Web site.

10. The required data elements for an anticipated Direct Loan disbursement are:

    a. Disbursement Number, <DisbursementNumber>

    b. Disbursement Amount (gross), <DisbursementAmount>

    c. Disbursement Date, <DisbursementDate>

    d. Disbursement Release Indicator set to false, <DisbursementReleaseIndicator = "false”>

    e. Disbursement Sequence Number, <DisbursementSequenceNumber>

    f. Disbursement Net Amount, <DisbursementNetAmount>

    g. Disbursement Fee Amount, <DisbursementFeeAmount>
11. The required data elements for Direct Loan actual disbursement are:

a. Disbursement Number, <DisbursementNumber=""/>

b. Disbursement Amount (gross), <DisbursementAmount>

c. Disbursement Date, <DisbursementDate>

d. Disbursement Release Indicator set to true, <DisbursementReleaseIndicator="true"/>

e. Disbursement Sequence Number, <DisbursementSequenceNumber>

f. Disbursement Net Amount, <DisbursementNetAmount>

g. Disbursement Fee Amount, <DisbursementFeeAmount>

h. Interest Rebate Amount, <InterestRebateAmount>

i. Payment Period Start Date <PaymentPeriodStartDate>

j. Enrollment School Code <EnrollmentSchoolCode>

k. Enrollment Status <EnrollmentStatus>

l. Published Program Length Years <PublishedPgmLengthYears>

m. Published Program Length Months <PublishedPgmLengthMonths>

n. Published Program Length Weeks <PublishedPgmLengthWeeks>

o. Weeks Programs Academic Year <WeeksProgramsAcademicYear>

p. Special Programs <SpecialPrograms>

q. Program Credential Level <ProgramCredentialLevel>

r. Program CIP Code <ProgramCIPCode>

s. Program CIP Code Year <ProgramCIPCodeYear>

Direct PLUS Loan Actual Disbursement

The COD System does not accept Direct PLUS Loan disbursements with a Disbursement Release Indicator = true without an approved credit decision on file.
i. Payment Period Start Date
   <PaymentPeriodStartDate>

j. Enrollment School Code <EnrollmentSchoolCode>

k. Enrollment Status <EnrollmentStatus>

l. Published Program Length Years
   <PublishedPgmLengthYears>

m. Published Program Length Months
   <PublishedPgmLengthMonths>

n. Published Program Length Weeks
   <PublishedPgmLengthWeeks>

o. Weeks Programs Academic Year
   <WeeksProgramsAcademicYear>

p. Special Programs
   <SpecialPrograms>

q. Program Credential Level
   <ProgramCredentialLevel>

r. Program CIP Code <ProgramCIPCode>

s. Program CIP Code Year <ProgramCIPCodeYear>

12. The calculation to determine whether or not to increase the CFL is driven by:
   a. Disbursement Date,
   b. Disbursement Release Indicator set to true, and
   c. Acceptance of an actual disbursement.

13. Schools participating in Advance Funded can submit a Disbursement Release Indicator = true up to seven (7) calendar days prior to the disbursement date.
   a. When the current date is seven (7) calendar days or less prior to the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts the actual disbursement if the MPN is accepted for that loan. The COD System will not accept a PLUS actual disbursement without an approved credit decision on file.
      i. The CFL calculation is performed and uses the actual disbursement to determine if the CFL needs to be increased once the promissory note is on file.
      ii. When the actual disbursement is accepted prior to the disbursement date and the promissory note is on file, the actual disbursement is booked on the disbursement date and passed to Servicing.
b. When the current date exceeds seven (7) calendar days prior to the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with Edit 051.

14. Schools placed in Cash Monitoring 1 (HCM1) review status by the School Participation Team (SPT) can submit a Disbursement Release Indicator = true up to seven (7) calendar days prior to the disbursement date.

   a. When the current date is seven (7) calendar days or less prior to the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System will accept the actual disbursement if the MPN is accepted for that loan. If the MPN is not accepted, the actual disbursement is rejected. In addition, the COD System does not accept a PLUS actual disbursement without an approved credit decision on file.

   i. The CFL calculation is performed and uses the actual disbursement to determine if the CFL needs to be increased.

   ii. When the actual disbursement is accepted prior to the disbursement date, the actual disbursement is booked on the disbursement date and passed to Servicing.

b. When the current date is more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with Edit 051.

15. Schools placed in Reimbursement or Cash Monitoring 2 (HCM2) review status by the School Participation Team can submit a Disbursement Release Indicator = true if the current date is equal to or after the Disbursement Date.

   a. If the current date is equal to or after the Disbursement Date and the Disbursement Release Indicator is set to true the disbursement is reviewed and may be approved by FSA.

   i. The disbursement status will display as ‘Review’ on the COD Web site.

   Identifying Disbursement Dates
   For schools participating in HCM1, the Pending Disbursement List report can assist in identifying estimated disbursements and their disbursement dates.
ii. Schools will not receive a common record response until the disbursements have been reviewed and approved or rejected by the Payment Analyst.

iii. CFL is increased based upon approvals by the School Participation Team. Reimbursement and Cash Monitoring 2 schools do not receive a CFL until the COD System accepts and posts actual disbursements.

iv. The Payment Analyst creates a drawdown request for Pell, Direct Loan, and TEACH.

v. Reimbursement and HCM2 schools are required to have an accepted origination record and accepted MPN before COD will accept actual disbursements.

b. When Direct Loan Schools are placed on Cash Monitoring 2 (HCM2) or Reimbursement, COD will automatically reduce the CFL to be equal to the sum of the Net Accepted and Posted Disbursement or Net Drawdowns (whichever is greater) for all open award years.

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**Payment Analyst**

The Payment Analyst is formerly referred to as Reimbursement Analyst.

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### Reporting Pennies in the Award and Disbursement Amount Data Elements

The Award and Disbursement Amounts on the Common Record may include pennies. In the Direct Loan Program, pennies are not processed or stored by the COD System. All Direct Loan reported amounts that include partial dollar amounts will be truncated. Including pennies in Direct Loan disbursement records could make reconciliation efforts more difficult.

**Business Rules**

1. The data elements for Award and Disbursement Amounts on the Common Record may include two digits to the right of a decimal point.

2. The Direct Loan Program does not process or store award and disbursement amounts using pennies.

3. Pennies that are reported in the award and disbursement amount data elements will be truncated by the COD System. The COD System does not round to the nearest dollar when truncating reported amounts. For example, a reported amount of $2625.67 is truncated to $2625.

4. The award and disbursement amount data elements are:
   
   a. **Award Amount**, `<FinancialAwardAmount>`
   
   b. **Award Amount Requested**, `<FinancialAwardAmountRequested>`
c. Disbursement Amount (gross),
   <DisbursementAmount>

d. Disbursement Fee Amount,
   <DisbursementFeeAmount>

e. Interest Rebate Amount, <InterestRebateAmount>

f. Disbursement Net Amount,
   <DisbursementNetAmount>

Calculating Direct Loan Disbursements

The next two sections discuss these calculations and provide examples. This first section discusses Disbursement Amount (Gross) Calculations. The next section discusses Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations.

Business Rules

1. The current method to calculate individual Disbursement Amounts (Gross) and the current rounding logic have not changed since the implementation of COD. The variance is still applied to the last disbursement. See Disbursement Amount (Gross) Calculations below for steps and examples.

2. Schools submit the Disbursement Amount (gross), Disbursement Fee Amount, Interest Rebate Amount and Disbursement Net Amount to the COD System for disbursements.

3. The method to calculate the Disbursement Net Amount and Disbursement Fee Amount and Interest Rebate Amount is a six step process. See the next section Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations for the calculations and examples.

4. Origination fees are determined based on the Earliest Disbursement Date (actual disbursements take precedence over anticipated disbursements). For a table of the new origination fees please refer to the Origination Fees Periods and Percentage Table in the Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations topic.

5. A system generated response will be sent to the reporting school of a student where Origination Fee, Interest Rebate Percentage and Disbursement Net, Fee and Rebate Amounts have been changed using the new message class CROFYYOP.

Disbursement Amount (Gross) Calculations

When determining disbursement amounts (gross) for a loan, dollar figures are rounded to the nearest dollar and all disbursements are equal
with the exception of the last disbursement, in some cases. This is due to any variance being applied to the last disbursement.

When computing gross disbursement amounts, use the following specifications:

**Step 1: Individual disbursement amount is Award Amount divided by the total number of disbursements.** If necessary, truncate any positions that exist past 2 decimal places.

**Step 2: Round the individual disbursement amount. Rounding occurs at the 1st and 2nd decimal places to the nearest dollar.**
If the 1st and 2nd decimal places are 50 or greater, increase the 1st digit to the left of the decimal sign by one.
If the 1st and 2nd decimal places are less than 50, do not change the 1st digit to the left of the decimal sign.

**Step 3: To determine the amount of the last disbursement, multiply the individual disbursement amount by the number of disbursements.**
If the sum of the disbursements is greater than the Loan Amount Approved, subtract the difference from the last disbursement.
If the sum of the disbursements is less than the Loan Amount Approved, add the difference to the last disbursement.
The variance is applied to the last disbursement.

*Example 1: Determining Gross Disbursement Amounts for Two Disbursements*
Suppose a student has an award of $3425.00, distributed across two disbursements.

**Step 1:** Divide the award amount by the number of disbursements.

\[ \frac{3425.00}{2} = 1712.50 \]

**Step 2:** Round at the 1st and 2nd decimal places to determine the individual disbursement amount.

Since the 1st and 2nd decimal places (of $1712.50) exceed 50, increase the first digit to the left of the decimal (the 2) by one.

$1712.50 is rounded to the nearest dollar, which is $1713.

**Step 3:** To determine the last disbursement amount, multiply the individual disbursement amount by the number of disbursements.

\[ 1713 \times 2 = 3426 \]

Since $3426 is more than $3425, subtract the difference of $1 from the value of the disbursement, which was determined in step 2. The last disbursement is equal to $1713 - $1 or $1712.

**Final Results:**

| 1st Disbursement Amount (gross) | $1713.00 |
Example 2: Determining Gross Disbursement Amounts for Three Disbursements

Suppose a student has an award of $1000.00, distributed across three disbursements.

**Step 1:** Divide the award amount by the number of disbursements.

\[ \frac{1000.00}{3} = 333.3333 \]

Truncate any positions that exist past the 2nd digit to the right of the decimal.

$333.3333$ truncates to $333.33$ 

**Step 2:** Round at the 1st and 2nd decimal places to determine the individual disbursement amount.

Since the 1st and 2nd decimal places (of $333.33$) do not exceed 50, truncate all decimal places.

$333.33$ is rounded to the nearest dollar, which is $333$.

The gross disbursement amount for all disbursements (except the last disbursement) is $333$.

**Step 3:** To determine the last disbursement amount, multiply the individual disbursement amount by the number of disbursements.

\[ 333 \times 3 = 999 \]

Since $999$ is less than $1000$, add the difference of $1$ from the value of the disbursement, which was determined in step 2. The last disbursement is equal to $333 + 1$ or $334$.

**Final Results:**

<table>
<thead>
<tr>
<th>Disbursement Amount</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Gross Disbursement Amount</td>
<td>$333.00</td>
</tr>
<tr>
<td>2nd Gross Disbursement Amount</td>
<td>$333.00</td>
</tr>
<tr>
<td>3rd Gross Disbursement Amount</td>
<td>$334.00</td>
</tr>
<tr>
<td>Total Award Amount</td>
<td>$1000.00</td>
</tr>
</tbody>
</table>

Example 3: Determining Gross Disbursement Amounts for Six Disbursements

<table>
<thead>
<tr>
<th>Disbursement Amount</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>2nd Gross Disbursement Amount (gross)</td>
<td>$1712.00</td>
</tr>
<tr>
<td>Total Award Amount</td>
<td>$3425.00</td>
</tr>
</tbody>
</table>
Suppose a student has an award of $22,167.00, distributed across six disbursements.

**Step 1:** Divide the award amount by the number of disbursements.

$22,167.00 \div 6 = $3,694.50

Round to two decimal places by truncating any positions that exist past the 2nd digit to the right of the decimal.

$3,694.500 truncates to $3,694.50

**Step 2:** Round at the 1st and 2nd decimal places to determine the individual disbursement amount.

Since the 1st and 2nd decimal places (of $3,694.50) is 50, truncate all decimal places and round the first digit to the left of the decimal up by one.

$3,694.50 is rounded to the nearest dollar, which is $3,695.

The gross disbursement amount for all disbursements (except the last disbursement) is $3,695

**Step 3:** To determine the last disbursement amount, multiply the individual disbursement amount by the number of disbursements.

$3,695 \times 6 = $22,170

Since $22,170 is greater than $22,167, subtract the difference of $3 from the value of the disbursement, which was determined in step 2. The last disbursement is equal to $3,695 - $3 or $3,692.

**Final Results:**

<table>
<thead>
<tr>
<th>Gross Disbursement Amount</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st</td>
<td>$3695.00</td>
</tr>
<tr>
<td>2nd</td>
<td>$3695.00</td>
</tr>
<tr>
<td>3rd</td>
<td>$3695.00</td>
</tr>
<tr>
<td>4th</td>
<td>$3695.00</td>
</tr>
<tr>
<td>5th</td>
<td>$3695.00</td>
</tr>
<tr>
<td>6th</td>
<td>$3692.00</td>
</tr>
</tbody>
</table>

**Total Award Amount**   $22,167.00
Origination Fee Calculation

Loan Origination Fee Change
The COD system will not allow you to change the Origination Fee Percent on an active loan. If a school needs to change the Origination Fee, they must first inactivate the loan by reducing the award and disbursement amounts to $0.

Origination Fee Percent for Subsidized and Unsubsidized Direct Loans
For Subsidized and Unsubsidized Direct Loan originations, the COD System uses the Disbursement Date on the earliest dated actual disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent, regardless of the award year. If no actual disbursements are submitted, the system will use the Disbursement Date of the earliest dated anticipated disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent was submitted, regardless of the award year. Actual disbursements (DRI = true) will always take precedence over anticipated disbursements (DRI = false) when determining the Earliest Disbursement Date. The Origination Fee Percent will vary depending on the Origination Fee Period in which the earliest Disbursement Date falls.

- If a loan is submitted with an Earliest Disbursement Date prior to July 1, 2007, the corresponding Origination Fee Percent must be 3%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2007 and before July 1, 2008, the corresponding Origination Fee Percent must be 2.5%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2008 and before July 1, 2009, the corresponding Origination Fee Percent must be 2%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2009 and before July 1, 2010, the corresponding Origination Fee Percent must be 1.5%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2010 and before July 1, 2013, the corresponding Origination Fee Percent must be 1%
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2013 and before December 1, 2013, the corresponding Origination Fee Percent must be 1.051%.
- If a loan is submitted with an Earliest Disbursement Date on or after December 1, 2013 and before October 1, 2014, the corresponding origination fee must be 1.072%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2014 and before October 1, 2015, the corresponding origination fee must be 1.073%
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2015 and before October 1, 2016, the corresponding origination fee must be 1.068%
• If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2016 and before October 1, 2017, the corresponding origination fee must be 1.069%.

• If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2017 and before October 1, 2018, the corresponding origination fee must be 1.066%.

• If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2018 and before October 1, 2019, the corresponding origination fee must be 1.062%.

• If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2019 and before October 1, 2020, the corresponding origination fee must be 1.059%.

• If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2020 and before October 1, 2022, the corresponding origination fee must be 1.057%.

**Origination Fees Periods and Percentage Table**

<table>
<thead>
<tr>
<th>Earliest Disbursement Date Range</th>
<th>Fee %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to 06/30/2007</td>
<td>3.0</td>
</tr>
<tr>
<td>07/01/2007 and 06/30/2008</td>
<td>2.5</td>
</tr>
<tr>
<td>07/01/2008 and 06/30/2009</td>
<td>2.0</td>
</tr>
<tr>
<td>07/01/2009 and 06/30/2010</td>
<td>1.5</td>
</tr>
<tr>
<td>07/01/2010 and 06/30/2013</td>
<td>1.0</td>
</tr>
<tr>
<td>07/01/2013 and 09/30/2013</td>
<td>1.051</td>
</tr>
<tr>
<td>12/01/2013 and 09/30/2014</td>
<td>1.072</td>
</tr>
<tr>
<td>10/01/2014 and 09/30/2015</td>
<td>1.073</td>
</tr>
<tr>
<td>10/01/2015 and 09/30/2016</td>
<td>1.068</td>
</tr>
<tr>
<td>10/01/2016 and 09/30/2017</td>
<td>1.069</td>
</tr>
<tr>
<td>10/01/2017 and 09/30/2018</td>
<td>1.066</td>
</tr>
<tr>
<td>10/01/2018 and 09/30/2019</td>
<td>1.062</td>
</tr>
<tr>
<td>10/01/2019 and 09/30/2020</td>
<td>1.059</td>
</tr>
<tr>
<td>10/01/2020 and 09/30/2022</td>
<td>1.057</td>
</tr>
</tbody>
</table>

For new award originations, the COD System will return an award level reject edit if the Origination Fee Percent is not consistent with the Origination Fee Period in which the Earliest Disbursement Date falls.

**Origination Fee Percentage for PLUS Direct Loans**

For Direct PLUS Loan originations, the COD System uses the Disbursement Date on the earliest dated actual disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent, regardless of the award year. If no actual disbursements are submitted, the system will use the Disbursement Date of the earliest dated anticipated disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent was submitted, regardless of the award year. Actual disbursements (DRI = true) will always take precedence over anticipated disbursements (DRI = false)
when determining the Earliest Disbursement Date. The Origination Fee Percent will vary depending on the Origination Fee Period in which the earliest Disbursement Date falls.

- If a loan is submitted with an Earliest Disbursement Date prior to July 1, 2013 the corresponding Origination Fee Percent must be 4%.

- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2013 and before December 1, 2013, the corresponding Origination Fee Percent must be 4.204%.

- If a loan is submitted with an Earliest Disbursement Date on or after December 1, 2013 and before October 1, 2014, the corresponding Origination Fee Percent must be 4.288%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2014 and before October 1, 2015, the corresponding Origination Fee Percent must be 4.292%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2015 and before October 1, 2016, the corresponding Origination Fee Percent must be 4.272%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2016 and before October 1, 2017, the corresponding Origination Fee Percent must be 4.276%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2017 and before October 1, 2018, the corresponding Origination Fee Percent must be 4.264%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2018 and before October 1, 2019, the corresponding Origination Fee Percent must be 4.248%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2019 and before October 1, 2020, the corresponding Origination Fee Percent must be 4.236%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2020 and before October 1, 2022, the corresponding Origination Fee Percent must be 4.228%.

### Origination Fees Periods and Percentage Table

<table>
<thead>
<tr>
<th>Earliest Disbursement Date Range</th>
<th>Fee %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to 07/01/2013</td>
<td>4.0</td>
</tr>
<tr>
<td>07/01/2013 and 11/30/2013</td>
<td>4.204</td>
</tr>
<tr>
<td>12/01/2013 and 09/30/2014</td>
<td>4.288</td>
</tr>
<tr>
<td>10/01/2014 and 09/30/2015</td>
<td>4.292</td>
</tr>
<tr>
<td>10/01/2015 and 09/30/2016</td>
<td>4.272</td>
</tr>
<tr>
<td>10/01/2016 and 9/30/2017</td>
<td>4.276</td>
</tr>
<tr>
<td>10/01/2017 and 9/30/2018</td>
<td>4.264</td>
</tr>
<tr>
<td>10/01/2018 and 9/30/2019</td>
<td>4.248</td>
</tr>
</tbody>
</table>
How to Submit Changes to Origination Fee Percentages

To submit changes to the origination fee percentage, a school should complete the following actions:

For Direct Loan awards with only anticipated disbursements.

Option 1 –
Step 1: Reduce the award amount and disbursements to $0 to inactivate the original award.  
*Wait for an accepted acknowledgement.*

Step 2: Reactivate the original award by submitting all of the following information:
  - A change to the origination fee amount and the origination fee percentage that corresponds to the origination fee percentage period;
  - A change to the earliest disbursement date that corresponds to the origination fee percentage period; and
  - An updated award amount and the appropriate disbursement amount(s).

Option 2 –
Step 1: Reduce the award amount and disbursements to $0 to inactivate the original award.  
*Wait for an accepted acknowledgement.*

Step 2: Submit a new award that includes all of the following information:
  - The origination fee amount and an origination fee percentage that corresponds to the origination fee percentage period;
  - An earliest disbursement date that corresponds to the origination fee percentage period; and
  - The award amount and appropriate disbursement amount(s).

*NOTE:* For Direct PLUS Loans, if the credit check on file is more than 180 days in the past, a new credit check will be completed when the new award is processed. In addition, if the Direct PLUS Loan has an endorser, the borrower will need to complete a new Master Promissory Note and the endorser will need to complete a new Endorser Addendum.

For Direct Loan awards with at least one actual disbursement.

Option 1 –
Step 1: Reduce the disbursement amount(s) to $0 to inactivate the disbursement(s).  
*Wait for an accepted acknowledgement.*

Step 2: Reduce the award amount to $0 to inactivate the original award.  
*Wait for an accepted acknowledgement.*
Step 3: Submit a change to the origination fee percentage and a change to the earliest disbursement date that corresponds to the origination fee percentage period. Wait for an accepted acknowledgement.

Step 4: Reactivate the original award by submitting an updated award amount and the appropriate disbursement amount(s).

Option 2 –

Step 1: Reduce the disbursement amount(s) to $0 to inactivate the disbursement(s). Wait for an accepted acknowledgement.

Step 2: Reduce the award amount to $0 to inactivate the original award. Wait for an accepted acknowledgement.

Step 3: Submit a new award that includes all of the following information:

- The origination fee amount and an origination fee percentage that corresponds to the origination fee percentage period;
- An earliest disbursement date that corresponds to the origination fee percentage period; and
- The award amount and appropriate disbursement amount(s).

NOTE: For Direct PLUS Loans, if the credit check on file is more than 180 days in the past, a new credit check will be completed when the new award is processed. In addition, if the Direct PLUS Loan has an endorser, the borrower will need to complete a new Master Promissory Note and the endorser will need to complete a new Endorser Addendum.

COD Reject Edit 213

COD Reject Edit 213 (Actual Disbursement Submitted with EDD after an established date) will be returned when a school submits an actual disbursement (Disbursement Release Indicator (DRI) equals true) and the earliest disbursement date (EDD) on the award is on or after an established date (see the Note below). The disbursement-level edit will be applied to all Direct Loan award types and across all active award years.

Awards with an EDD on or after the established date and that only contain anticipated disbursements (DRI equals false) will be accepted with origination fees effective for the prior period.

Note: The established date will be determined by Federal Student Aid when changes to origination fees are expected and the new fees are unknown. We will inform the community of the established date through an Electronic Announcement when it is determined. At the time the new fees are known, reject Edit 213 will no longer be triggered. As an example, the established date for the next origination fee change is October 1, 2018. If a Direct Loan award with an actual disbursement is submitted to the COD System and the EDD is on or after October 1, 2018, the award will be rejected with COD Reject Edit 213.
**Interest Rebate Calculation**

**Interest Rebate Percent for Subsidized and Unsubsidized Direct Loans**

For Subsidized and Unsubsidized Direct Loan originations, the COD System uses the Disbursement Date on the earliest dated actual disbursement, regardless of disbursement number, to confirm the appropriate Interest Rebate Percent, regardless of the award year. If no actual disbursements are submitted, the system will use the Disbursement Date of the earliest dated anticipated disbursement, regardless of disbursement number, to confirm the appropriate Interest Rebate Percent was submitted, regardless of the award year. Actual disbursements (DRI = true) will always take precedence over anticipated disbursements (DRI = false) when determining the Earliest Disbursement Date. The Interest Rebate Percent will vary depending on the Interest Rebate Period in which the earliest Disbursement Date falls.

- If a loan is submitted with an Earliest Disbursement Date prior to July 1, 2009, the corresponding Interest Rebate Percent must be 1.5%.

- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2009 and before July 1, 2010, the corresponding Interest Rebate Percent must be 1.0%.

- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2010 and before 7/1/2012, the corresponding Interest Rebate Percent must be 0.5%.

- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2012, the corresponding Interest Rebate Percent must be 0%.

**Interest Rebate Periods and Percentage Table**

<table>
<thead>
<tr>
<th>Earliest Disbursement Date Range</th>
<th>Rebate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to 06/30/2009</td>
<td>1.5</td>
</tr>
<tr>
<td>07/01/2009 to 06/30/2010</td>
<td>1.0</td>
</tr>
<tr>
<td>07/01/2010 to 06/30/2012</td>
<td>0.5</td>
</tr>
<tr>
<td>07/01/2012 and forward</td>
<td>0</td>
</tr>
</tbody>
</table>

For new award originations, the COD System will return an award level reject edit if the Interest Rebate Percentage is not consistent with the Interest Rebate Period in which the Earliest Disbursement Date falls.

**Interest Rebate Percent for PLUS Direct Loans**

The interest rebate percent for PLUS loans is 1.5% for loans submitted with an Earliest Disbursement Date before 7/1/2012. For loans submitted with an Earliest Disbursement Date on or after 7/1/2012, the Interest Rebate Percentage will be processed as 0% for all DL awards including Sub, Unsub and PLUS.
**Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations**

A 6-step calculation is used to derive the Disbursement Net Amount, Disbursement Fee Amount and Interest Rebate Amount. This process allows a school to start the calculation with either the gross disbursement amount or the net disbursement amount and end with the same results.

**Business Rules**

The following business rules apply to all Direct Loan types:

1. An up-front interest rebate amount is calculated at the disbursement level by the schools for each Subsidized, Unsubsidized, and PLUS loan.

2. The Combined Fee/Interest Rebate is a field used to assist in the calculation of the net disbursement amount. This field is for the calculation only and is NOT a field sent to the COD System.

3. When calculating the Combined Fee/Interest Rebate Amount and the Loan Fee Amount, take all results out three (3) decimal places to ensure consistent results and then truncate.

4. When determining the Combined Fee/Interest Rebate Amount, Disbursement Fee Amount, and the Interest Rebate Amount truncate the result by removing the cents from the whole dollar amount. Do not round to the nearest dollar when truncating.

5. Beginning in July 2012, the Interest Rebate Percentage is 0% for all Direct Loan awards including Unsubsidized, Subsidized and PLUS. This will apply to all DL awards with the Earliest Disbursement Date on or after 7/1/2012.

6. When calculating the individual Disbursement Fee Amount, Interest Rebate Amount, and Disbursement Net Amount, use the following specifications for all disbursements:
To calculate **Net Disbursement Amount**
Step 1: Combined Fee/Interest Rebate Amount (go out to 3 decimal places) = Disbursement Amount (Gross) x (Origination Fee Percent – Interest Rebate Percent)

Step 2: Truncate the Combined Fee/Interest Rebate Amount

Step 3: Disbursement Net Amount = Disbursement Amount (gross) – Combined Fee/Interest Rebate Amount

To calculate **Loan Fee Amount**
Step 4: Disbursement Fee Amount (go out to 3 decimal places) = Disbursement Amount (gross) x Origination Fee Percent

Step 5: Truncate the Disbursement Fee Amount

To calculate **Interest Rebate Amount**
Step 6: Interest Rebate Amount = Disbursement Net Amount – (Disbursement Amount (gross) – Disbursement Fee Amount)

To calculate from Disbursement Net Amount to Disbursement Amount (gross) use the following calculation:

Disbursement Net Amount multiplied by 100 divided by 100 minus (Fee% - Rebate%)

OR For PLUS loans, Disbursement Net Amount divided by .95796 = Disbursement Amount (gross) (rounded)

Then proceed with Step 4.

To calculate **Gross Disbursement Amount using the Net Disbursement Amount**
Step 1: Determine the Origination Fee Percentage (go out 3 decimal places) and the Interest Rebate Percentage (go out 2 decimal places)

Step 2: Gross Amount = Net Amount divided by (1 minus the Origination Fee Percentage + Interest Rebate Percentage)
Example 1a – DL Sub/Unsub Origination with three disbursements
Suppose the Disbursement Date of the earliest disbursement is 2012-09-30. The origination fee percent will be 1.0%, Interest Rebate fee will be 0%. The combined fee/interest rebate amount, disbursement net amount, disbursement fee amount, and interest rebate amount for each disbursement will be calculated as follows:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$1167</td>
<td>1167 × (.010 - .000) = 11.67</td>
<td>1167 - 11 = 1156</td>
<td>1167 × .010 = 11.67</td>
<td>11</td>
<td>1156 - (1167 - 11) = 0</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>$1167</td>
<td>1167 × (.010 - .00) = 11.67</td>
<td>1167 - 11 = 1156</td>
<td>1167 × .010 = 11.67</td>
<td>11</td>
<td>1156 - (1167 - 11) = 0</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>$1166</td>
<td>1166 × (.010 - .000) = 11.66</td>
<td>1166 - 11 = 1155</td>
<td>1166 × .010 = 11.66</td>
<td>11</td>
<td>1155 - (1166 - 11) = 0</td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td>$3500</td>
<td>$3467</td>
<td></td>
<td>33</td>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Example 1b – DL PLUS Origination with three disbursements
Suppose the Disbursement Date of the earliest disbursement is 2012-6-30. The origination fee will be 4.0%. The combined fee/interest rebate amount, disbursement net amount, disbursement fee amount, and interest rebate amount for each disbursement will be calculated as follows:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$1167</td>
<td>1167 × (.04 - .015) = 29.175</td>
<td>1167 - 29 = 1138</td>
<td>1167 × .04 = 46.68</td>
<td>46</td>
<td>1138 - (1167 - 46) = 17</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>$1167</td>
<td>1167 × (.04 - .015) = 29.175</td>
<td>1167 - 29 = 1138</td>
<td>1167 × .04 = 46.68</td>
<td>46</td>
<td>1138 - (1167 - 46) = 17</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>$1166</td>
<td>1166 × (.04 - .015) = 29.150</td>
<td>1166 - 29 = 1137</td>
<td>1166 × .04 = 46.64</td>
<td>46</td>
<td>1137 - (1166 - 46) = 17</td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td>$3500</td>
<td>$3413</td>
<td></td>
<td>138</td>
<td>51</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Example 2: DL Sub Origination with twelve disbursements

Suppose the Disbursement Date of the earliest disbursement is 2012-06-30. The origination fee percent will be 1.0%, Interest Rebate fee will be 0.5%. The combined fee/interest rebate amount, disbursement net amount, disbursement fee amount, and interest rebate amount for each disbursement will be calculated as follows:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>2</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>3</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>4</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>5</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>6</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>7</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>8</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>9</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>10</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>11</td>
<td>$319</td>
<td>319 × (.010 - .005) = 1.595</td>
<td>1</td>
<td>319 - 1 = 318</td>
<td>319 × .010 = 3.19</td>
<td>3</td>
<td>318 - (319- 2) = 1</td>
</tr>
<tr>
<td>12</td>
<td>$316</td>
<td>316 × (.010 - .005) = 1.58</td>
<td>1</td>
<td>316 - 1 = 315</td>
<td>316 × .010 = 3.16</td>
<td>3</td>
<td>315 - (316- 2) = 1</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>$3825</strong></td>
<td><strong>$3813</strong></td>
<td><strong>36</strong></td>
<td><strong>12</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Updating Academic Year and Financial Award Begin and End Dates

It is critically important that schools accurately report academic year dates and loan period start and end dates for all types of Direct Loans (Direct Subsidized, Direct Unsubsidized, and Direct PLUS) to COD. It is equally important that schools update a loan’s previously reported loan period dates if the borrower’s actual attendance during the loan period is different from the anticipated attendance that was the basis for the school’s initial reporting to COD. COD will reject an Academic Year where the date range does not meet the minimum regulatory requirements for academic year length with reject edit 046. Refer to the Federal Student Aid Handbook for additional information.

The following are some of the reasons that would require a school to update a student’s loan period:
• The borrower requests that a disbursement that is attributable to an entire payment period be cancelled;
• The borrower does not begin attendance, or does not begin attendance on at least a half-time basis, in a payment period that was included in the originally reported loan period and the school did not make any disbursements of the loan for that payment period;
• The school determines that the borrower is not eligible to receive a Direct Loan for a payment period that was part of the originally reported loan period;
• The borrower withdraws during a payment period that was included in the originally reported loan period and, as a result, the entire amount of the disbursement that was intended for that payment period is returned under the Return to Title IV aid calculation (R2T4); or
• For clock-hour programs, non-term credit hour programs, and certain types of non-standard term credit-hour programs, the borrower fails to progress to the next payment period or academic year as scheduled.

In most cases, the Academic Year dates will not need to be updated. Academic year dates should only be updated under specific circumstances for example:

• Original dates were inaccurately reported
• The student is attending during the summer term and receiving a loan.
• For clock-hour programs, non-term credit hour programs, and certain types of non-standard term credit-hour programs, the borrower fails to progress to the next payment period or academic year as scheduled.

Business Rules for Updating Academic Year and Financial Award Begin and End Dates

1. To update Loan Period dates the following data elements are required:
   a. Financial Award Begin Date
      <FinancialAwardBeginDate>
   b. Financial Award End Date
      <FinancialAwardEndDate>

2. To update Academic Year dates the following data elements are required:
   a. Academic Year Begin Date
      <AcademicYearBeginDate>
   b. Academic Year End Date
      <AcademicYearEndDate>
Note: If you are zeroing out an unused disbursement, you may also need to shorten the loan period. This may be done in the same transaction.

**Updating and Adjusting Direct Loan Disbursement Amounts and Dates**

While Disbursement Release Indicator is set to false, the Anticipated Disbursement Amounts and Dates can be updated. Once the Disbursement Release Indicator = true, the Actual Disbursement Amount and Dates can be adjusted.

**Business Rules for Updating Disbursements**

1. Disbursement Amount and Disbursement Date can be updated prior to a Disbursement Release Indicator = true.

2. To update a Disbursement Amount and/or Disbursement Date, the following data elements are required:
   a. Disbursement Release Indicator = false,

   ```xml
   <DisbursementReleaseIndicator = "false">
   `````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````````
1. Once a disbursement transaction with a Disbursement Sequence Number of “1” is accepted with a Disbursement Release Indicator = true, all Disbursement data elements can be adjusted.

2. An upward Disbursement Amount adjustment should occur on the Disbursement Date only if the additional funds are disbursed on that same date.

3. All Disbursement data elements can be adjusted in the same Disbursement complex element.

4. A disbursement transaction to adjust a Disbursement data element must have a unique Disbursement Sequence Number.

5. Disbursement Sequence Numbers for a specific Disbursement Number must be used in incremental, sequential order within the range of 1-65.

6. To determine the previous Sequence Number, a specific Disbursement Number is returned on all disbursement responses with Disbursement Sequence Number greater than 1 and can be used to determine the next Disbursement Sequence Number.

7. Disbursement Date is always the date the cash was credited to the student’s account (according to Federal regulations) or paid to the student (or parent, if PLUS loan) directly for a specific disbursement number.

8. Direct Loan disbursement amounts can be adjusted to $0.

9. To adjust a Disbursement, the following data elements are always required:

   a. Disbursement Release Indicator = true, 
      \(<\text{DisbursementReleaseIndicator} = \text{“true”}\)>

   b. Disbursement Number, \(<\text{DisbursementNumber} = \text{“”}\)>

   c. New Disbursement Sequence Number, 
      \(<\text{DisbursementSequenceNumber}\)>

   d. New Disbursement Amount (gross), 
      \(<\text{DisbursementAmount}\)>

   e. Disbursement Date, \(<\text{DisbursementDate}\)>

   f. New Disbursement Net Amount, 
      \(<\text{DisbursementNetAmount}\)>

   g. New Disbursement Fee Amount, 
      \(<\text{DisbursementFeeAmount}\)>

   h. New Interest Rebate Amount, 
      \(<\text{InterestRebateAmount}\)>

Transaction Date Not Submitted

Schools must submit the Disbursement Date, not the transaction date for adjusted disbursement amounts. See Example below.
10. The following Disbursement data elements are required only when updating the value:

   a. Payment Period Start Date
   b. Enrollment School Code
   c. Enrollment Status
   d. CIP Code

**Example**

When submitting an adjusted disbursement amount for an actual disbursement on the Common Record, the Disbursement Date (i.e. the date the school disburses the funds to the student) is reported. The transaction date (i.e. the date the school processes the adjusted disbursement amount) is not submitted.

A school disburses the first disbursement of a loan to a student for $2000 on 9/10/2014. The school discovers that the disbursement amount needs to be corrected to $1000.

On 9/15/2014, the school adjusts the disbursement amount to $1000. The school then discovers that the student needs the full original loan amount.

On 9/20/2014, the school disburses a second disbursement to the student for $1000. The school does NOT upwardly adjust the first disbursement since the additional funds were disbursed on a different date. The actual disbursement transaction and adjusted disbursement transaction must be submitted on the Common Record as follows:

<table>
<thead>
<tr>
<th>Disbursement Release Indicator</th>
<th>Disb #</th>
<th>Disb Sequence #</th>
<th>Disbursement Date</th>
<th>Disb Amount (gross)</th>
<th>Fee Amount</th>
<th>Interest Rebate Amount</th>
<th>Net Disb Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actual Disbursement</td>
<td>true</td>
<td>1</td>
<td>1</td>
<td>09-10-2014</td>
<td>2000</td>
<td>20</td>
<td>1980</td>
</tr>
<tr>
<td>Adjusted Disbursement</td>
<td>true</td>
<td>1</td>
<td>2</td>
<td>09-10-2014*</td>
<td>1000</td>
<td>10</td>
<td>990</td>
</tr>
<tr>
<td>Actual Disbursement</td>
<td>true</td>
<td>2</td>
<td>1</td>
<td>09-20-2014</td>
<td>1000</td>
<td>10</td>
<td>990</td>
</tr>
</tbody>
</table>

* Do not submit the transaction date of 09-15-2014 on the Adjusted Disbursement.

**Disbursement Requirements for Award Amount Updates**

The anticipated and actual disbursement amounts that exist for the award determine whether a change to the Award Amount is accepted or rejected by the COD System. Anticipated disbursement information may be recalculated by the COD System when the school submits a change to the Direct Loan Award Amount on an existing award.

**Business Rules**
1. The COD System compares the changed Award Amount to the sum of the actual disbursements (Disbursement Release Indicator = true) and the sum of the anticipated disbursements (Disbursement Release Indicator = false) to determine if the change to the Award Amount should be rejected or accepted.

2. A change to the Award Amount is accepted if the new Award Amount is greater than or equal to the sum of the actual disbursements.

3. A change to the Award Amount is rejected if the new Award Amount is less than the sum of the actual disbursements. The change to the Award Amount rejects with error code 041. (Edit 041 is only returned if the Disbursement Release Indicator = true on the change record).

4. If a new Award Amount is less than the sum of the anticipated disbursements and the sum of the actual disbursements is equal to $0, the COD System recalculates the anticipated disbursements until the sum of the anticipated disbursements is equal to the new Award Amount. Edit 118 informs the school that the anticipated disbursements have been recalculated.
   a. The COD System recalculates the anticipated disbursements by first reducing the last anticipated disbursement (highest disbursement number) and then reducing each of the previous disbursement amounts as needed. Please see Example 1.
   b. The COD System does not recalculate the anticipated disbursements when the school submits both a reduction to the Award Amount and adjustments to the anticipated disbursements in the same submission to the COD System.

5. If the Award Amount is reduced to $0 and the sum of the actual disbursements is equal to $0, all anticipated disbursements are reduced to $0 to allow loan inactivation. Warning edit 119 is returned in the Response document to inform schools that all anticipated disbursements have been reduced to $0.

6. If an accepted Award Amount is less than the original Award Amount, but greater than the sum of the anticipated disbursements, the anticipated disbursements are not recalculated by the COD System. Please see example 2.

7. When COD recalculates an anticipated disbursement, the Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amounts are also recalculated.

Please refer to the Inactivating a Direct Loan topic for more information on loan inactivation.

Please refer to the Calculating Direct Loan Disbursements and the Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations topics for more information about Direct Loan calculations performed by the COD System.
8. The COD system returns zero in the actual and anticipated disbursement data elements in the Direct Loan Rebuild file for an award with a Disbursement Release Indicator = true and the sums of the actual and anticipated disbursements equal zero. These data elements contain zero in both the origination and disbursement segments of the file.

Example 1

The award amount changes from $6000 to $1500 on an award with no actual disbursements on file. The anticipated disbursements are recalculated as follows:

<table>
<thead>
<tr>
<th>Disbursement Number</th>
<th>Previous Anticipated Disbursement Amount</th>
<th>New Anticipated Disbursement Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$2000</td>
<td>$1500</td>
</tr>
<tr>
<td>2</td>
<td>$2000</td>
<td>$0</td>
</tr>
<tr>
<td>3</td>
<td>$2000</td>
<td>$0</td>
</tr>
</tbody>
</table>

Schools may need to redistribute the disbursement amounts in order to adhere to multiple disbursement and substantially equal disbursement regulations.
The award amount changes from $6000 to $3000 on an award with no actual disbursements on file. The anticipated disbursements are recalculated as follows:

<table>
<thead>
<tr>
<th>Disbursement Number</th>
<th>Previous Anticipated Disbursement Amount</th>
<th>New Anticipated Disbursement Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$2000</td>
<td>$2000</td>
</tr>
<tr>
<td>2</td>
<td>$2000</td>
<td>$1000</td>
</tr>
<tr>
<td>3</td>
<td>$2000</td>
<td>$0</td>
</tr>
</tbody>
</table>

**Example 2**
The award amount changes from $6000 to $8000 on an award with no actual disbursements on file. The anticipated disbursements are not recalculated since the sum of the anticipated disbursements is less than the new award amount.

<table>
<thead>
<tr>
<th>Disbursement Number</th>
<th>Previous Anticipated Disbursement Amount</th>
<th>New Anticipated Disbursement Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$2000</td>
<td>$2000</td>
</tr>
<tr>
<td>2</td>
<td>$2000</td>
<td>$2000</td>
</tr>
<tr>
<td>3</td>
<td>$2000</td>
<td>$2000</td>
</tr>
</tbody>
</table>

**Inactivating a Direct Loan**
To inactivate a Direct Loan, update the Award Amount to $0 and reduce actual disbursements to $0.

**Business Rules**
1. The Award Amount and actual disbursements must be reduced to $0 to inactivate a loan.
2. All activity can be generated and submitted in the same Common Record.
3. If the Award Amount is reduced to $0 and the sum of the actual disbursements is equal to $0, the COD System automatically reduces all anticipated disbursements to $0 to allow loan inactivation. Warning edit 119 is returned in the Response document to inform schools that all anticipated disbursements for the award have been reduced to $0. *Please see Example 1.*
4. A funded loan may be inactivated for a number of reasons. Examples include: A borrower returns all of the disbursed funds to the school within 120 calendar days of disbursement, or the school returns the money to comply with Federal Regulations. Gross, fees, interest and rebate are adjusted accordingly.
5. Schools must always return funds to COD via G5 or the electronic refund process.
**Example 1**

The award amount changes from $6000 to $0 on an award with no actual disbursements on file. The COD System reduces all anticipated disbursements to zero and inactivates the loan.

<table>
<thead>
<tr>
<th>Disbursement Number</th>
<th>Previous Anticipated Disbursement Amount</th>
<th>New Anticipated Disbursement Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$2000</td>
<td>$0</td>
</tr>
<tr>
<td>2</td>
<td>$2000</td>
<td>$0</td>
</tr>
<tr>
<td>3</td>
<td>$2000</td>
<td>$0</td>
</tr>
</tbody>
</table>

**Generating Direct Loan Booking Notification Responses**

The COD System generates a Booking Notification Response when the loan books with the initial disbursement. Subsequent Booking Notifications are NOT sent for each subsequent funded disbursement.

**Business Rules**

1. A loan books when all the following exists on the COD System:
   
   a. **Accepted Award**

      When the Response Code is equal to “Accepted” and the Disbursement Release Indicator is false, the Common Record Response indicates an accepted Award or in the case of Direct Loan accepted loan.

   b. **Accepted Actual Disbursement that is greater than $0 and has a disbursement date equal or prior to the current date.**

      When the Response Code is equal to “Accepted” and the Disbursement Release Indicator is true, the Common Record Response indicates an accepted actual Disbursement.

   c. **Accepted MPN**

   d. **Accepted Credit Decision for a PLUS loan.**

      When the Credit Decision Status tag `<CreditDecisionStatus>` indicates a status of “A,” it is indicating an accepted credit decision for the PLUS Loan.

2. Two tags on the Common Record assist a school in determining if an MPN is accepted.
   
   a. The MPN Status Code `<MPNStatusCode>` indicating a status of “A” (Accepted) OR
b. The MPN Link Indicator <MPNLinkIndicator> indicating a status of “true,” record has been linked to an MPN.

3. When a loan books, the COD System generates a Booking Notification Response to the school.

4. A COD system-generated Booking Notification Response contains a Document Type of BN. The Document Type indicates the type of Response.

5. A Response Document of Document Type BN contains a system-generated Document ID.

6. A Booking Notification Response contains the following data elements in the Response Complex Element <Response>:
   a. Booked Amount, <BookedAmount>
   b. Booked Date, <BookedDate>
   c. Document Type, <DocumentTypeCode>
   d. Processing Date, <ProcessDate>

7. Booked Amount is the total net amount of the first disbursement accepted and booked by COD for the award.

8. The Booking Notification allows a school to update their system with the Booked Status of a loan to assist with the Direct Loan reconciliation process.

Example
Below is a sample Booking Notification Response:

```
0*N05TG00790 ,CLS=CRBN22OP,XXX,BAT=000000000000000000002017-07-10T17:28:14.0000000001,
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2020/v4.0e"
-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<CreatedDateTime>2017-07-10T09:09:09.00</CreatedDateTime>
<Source>
<COD>
<RoutingID>00000001</RoutingID>
</COD>
</Source>
<Destination>
<School>
<RoutingID>12345678</RoutingID>
</School>
</Destination>
<FullResponseCode>F</FullResponseCode>
</TransmissionData>
<ReportingSchool>
<RoutingID>12345678</RoutingID>
```
<AttendedSchool>
  <RoutingID>12345678</RoutingID>
  <Student>
    <Index>
      <SSN>123456789</SSN>
      <BirthDate>1973-01-01</BirthDate>
      <LastName>SMITH</LastName>
    </Index>
    <Note>
      <SchoolNoteMessage>999999999</SchoolNoteMessage>
    </Note>
    <DLSubsidized>
      <FinancialAwardYear>2022</FinancialAwardYear>
      <Note>
        <SchoolNoteMessage>999999999</SchoolNoteMessage>
      </Note>
      <FinancialAwardNumber>1</FinancialAwardNumber>
      <FinancialAwardID>123456789S22G12345001</FinancialAwardID>
      <Response>
        <ResponseCode>A</ResponseCode>
        <BookedAmount>985</BookedAmount>
        <BookedDate>2017-07-10</BookedDate>
      </Response>
    </DLSubsidized>
    <Response>
      <ResponseCode>A</ResponseCode>
    </Response>
  </Student>
</AttendedSchool>

<ReportingSchool>
  <DocumentTypeCode>BN</DocumentTypeCode>
  <ProcessDate>2017-07-10</ProcessDate>
</ReportingSchool>

</CommonRecord>
Generating Payment to Servicer Responses

When a student or parent makes a payment to a Servicer within 120 calendar days of the disbursement date, the COD System generates a Payment to Servicer Response that is sent to a school. This transaction should be considered when determining the borrower’s eligibility for a subsequent loan.

Business Rules

1. A Payment to Servicer transaction is generated by the COD System and sent to a school when a borrower makes a payment to a Servicer within 120 calendar days of the disbursement date.

2. A Payment to Servicer transaction should NOT update the disbursed amount for the loan. This transaction is for informational purposes only and should be considered when determining the borrower’s eligibility for future loans.

3. The COD System will not send Payment to Servicer responses to schools containing PLUS loan data. COD will send Payment to Servicer responses to schools containing data for Subsidized and Unsubsidized loans only.

4. The following data elements are returned in addition to the Response complex element:
   a. Award Year, <FinancialAwardYear>
   b. Award ID, <FinancialAwardID>
   c. Disbursement Number, <Disbursement Number = "">
   d. Disbursement Sequence Number, <DisbursementSequenceNumber>

5. Disbursement Sequence Numbers on a Payment to Servicer Response are in descending, sequential order starting with 99 to 91.

6. The Payment to Servicer Response contains the <PreviousSequenceNumber> tag indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

7. The Payment to Servicer Amount is reported as a dollar value with a negative sign.
   a. If a previous Payment to Servicer Amount or partial amount needs to be reversed a positive dollar value is sent with the next descending sequential disbursement sequence number.
8. A COD system-generated Payment to Servicer Response contains a Document Type of PS. The Document Type indicates the type of Response.


10. A Payment to Servicer Response contains the following data elements in the Response complex element <Response>:

a. Payment to Servicer Amount, <PaymentToServicerAmount>

b. Payment to Servicer Date, <PaymentToServicerDate>

c. Document Type, <DocumentTypeCode>

d. Processing Date, <ProcessDate>

e. Previous Sequence Number, <PreviousSequenceNumber>

For all data elements refer to the sample on the next page.

**Example**
A school receives a Payment to Servicer transaction for $500 on a fully disbursed $3500 loan for a first year student. The school’s system should continue to store the borrower’s loan as $3500.

However, if the first year student decides to later request an additional loan for $500 for the same academic year, the $500 Payment to Servicer would be taken into consideration by the school when determining the student’s eligibility to borrow an additional $500 loan.

If the student is eligible to borrow the additional $500 loan, the school’s system should display two loans for this first-year student:

<table>
<thead>
<tr>
<th>Student Grade Level</th>
<th>Academic Year</th>
<th>Disbursed Loan Amount</th>
<th>Payment to Servicer</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>09/02/2014 to 06/20/2015</td>
<td>$3500</td>
<td>$500</td>
</tr>
<tr>
<td>1</td>
<td>09/02/2014 to 06/20/2015</td>
<td>$500</td>
<td></td>
</tr>
</tbody>
</table>

Annual Loan Limit for 1st Year = $3500

Total Disbursed for Academic Year = $4000

Payment to Servicer = $500

**Example**
Below is a sample Payment to Servicer Response.
<?xml version="1.0" encoding="UTF-8"?>
  <TransmissionData>
    <CreatedDateTime>2017-07-10T09:09:09.00</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>12345678</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>F</FullResponseCode>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>12345678</RoutingID>
    <AttendedSchool>
      <RoutingID>12345678</RoutingID>
      <Student>
        <Index>
          <SSN>123456789</SSN>
          <BirthDate>1973-01-01</BirthDate>
          <LastName>SMITH</LastName>
        </Index>
        <Note>
          <SchoolNoteMessage>999999999</SchoolNoteMessage>
        </Note>
        <DLSubsidized>
          <FinancialAwardYear>2022</FinancialAwardYear>
          <Note>
            <SchoolNoteMessage>999999999</SchoolNoteMessage>
          </Note>
          <FinancialAwardNumber>1</FinancialAwardNumber>
          <FinancialAwardID>123456789S22G12345001</FinancialAwardID>
          <Response>
            <ResponseCode>A</ResponseCode>
            <PaymentToServicerAmount>-1000.00</PaymentToServicerAmount>
            <PaymentToServicerDate>2017-07-10</PaymentToServicerDate>
          </Response>
          <Disbursement Number="1">
            <DisbursementSequenceNumber>99</DisbursementSequenceNumber>
            <Note>
              <SchoolNoteMessage>999999999</SchoolNoteMessage>
            </Note>
          </Disbursement>
        </DLSubsidized>
      </AttendedSchool>
      <Response>
        <ResponseCode>A</ResponseCode>
        <PreviousSequenceNumber>3</PreviousSequenceNumber>
      </Response>
    </AttendedSchool>
  </Response>
</CommonRecord>
Loan Discharge

A loan may be discharged for several reasons, some of which are: if the borrower is declared bankrupt, becomes totally and permanently disabled, dies, if the loan was the result of an unauthorized signature or payment or if the borrower is a victim of Identity Theft - False Certification. The Servicer notifies COD of the change in the loan and/or borrower’s condition and of the effective date of the loan discharge, or pending discharge. The discharge date is the date the Servicer received notification of the discharge such as unauthorized signature/payment, bankruptcy, or disability, or the date of the borrower’s death.

Business Rules Specific to Closed School, False Certification – Ability to Benefit, Total and Permanent Disability, False Certification – Disqualifying Status, Teacher Forgiveness, Borrower Defense, Unpaid Refund, and Bankruptcy

1. The COD system continues to process all disbursement activity for loans originated prior to and after the discharge date.

2. All MPNs are unaffected by the discharge.

Business Rules Specific to Death

1. Upon receipt of a discharge notification due to death, the COD System performs the following functions:

   a. Inactivates all MPNs for the borrower. MPNs will remain linked to loans dated prior to the discharge date, but cannot be linked to new loans.

   b. Updates the MPN Expiration Date for all discharged MPNs to be equal to the date of the loan discharge, unless the MPN Expiration Date precedes the discharge date. If the MPN Expiration Date is updated due to discharge, schools will receive an unsolicited promissory note response with the updated MPN Expiration Date for their information.

   c. Rejects the following disbursements with Edit 095:

      i. New actual disbursements submitted after the discharge date where the disbursement date is after the discharge date.
ii. New anticipated disbursements submitted after the discharge date where the disbursement date is after the discharge date.

iii. Upward actual disbursement adjustments submitted after the discharge date where the disbursement date is also after the discharge date.

iv. Actual Disbursement adjustments to an anticipated disbursement submitted after the discharge date where the disbursement date is after the discharge date.

d. Rejects all loan originations submitted after the discharge date with Edit 092.

Business Rules Specific to Unauthorized Signature/Payment and Identity Theft - False Certification:

1. Upon receipt of a discharge notification for an unauthorized signature/payment, the COD System performs the following functions:

   a. Inactivates only the MPN for the loan with an unauthorized signature/payment.

   b. Updates the MPN Expiration Date for the MPN associated with the discharge to equal the date of the loan discharge, unless the MPN Expiration Date precedes the discharge date. If the MPN Expiration Date is updated due to discharge, schools will receive an unsolicited promissory note response with the updated MPN Expiration Date for their information.

   c. Rejects the following disbursements for the affected award with Edit 094:

      i. New actual disbursements submitted after the discharge date where the disbursement date is after the discharge date.

      ii. New anticipated disbursements submitted after the discharge date where the disbursement date is after the discharge date.

      iii. Upward actual disbursement adjustments submitted after the discharge date where the disbursement date is also after the discharge date.

      iv. Actual disbursement adjustments to an anticipated disbursement submitted after the
discharge date where the disbursement date is after the discharge date.

2. A borrower is eligible for future Direct Loan aid.

3. The amount of the affected award is NOT applied toward the student’s annual loan limit.

### Impact of Loan Discharges on MPN, New Disbursements, and Originations

<table>
<thead>
<tr>
<th>Discharge Type</th>
<th>Discharge Reason</th>
<th>Count discharge amount toward the student's annual loan limit</th>
<th>Inactivate MPN</th>
<th>New Disbursements and Upward Adjustments on already originated loans</th>
<th>New Origination</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>C = Closed School</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>D = Death</td>
<td>No</td>
<td>Yes - ALL MPNs for borrower</td>
<td>Reject – All Awards</td>
<td>Reject – ALL</td>
</tr>
<tr>
<td>D</td>
<td>F = False Certification - Ability to Benefit</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>G = Unauthorized Signature/Unauthorized Payment</td>
<td>No</td>
<td>Yes - Only for MPN linked to loan being discharged</td>
<td>Reject - Just disbursements for the loan being discharged</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>H = Disability</td>
<td>Yes</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>I = False Certification – Identity Theft</td>
<td>No</td>
<td>Yes – Only for MPN linked to loan being discharged</td>
<td>Reject – Just disbursements for the loan being discharged</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>M = False Certification - Disqualifying Status</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>T = Teacher Forgiveness</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>U = Unpaid Refund</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>B = Borrower Defense</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>R = Disaster Relief</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>D</td>
<td>X = Bankruptcy</td>
<td>No</td>
<td>No</td>
<td>Accept</td>
<td>Accept</td>
</tr>
<tr>
<td>P</td>
<td>X = Bankruptcy</td>
<td>Not Processed</td>
<td>Not Processed</td>
<td>Not Processed</td>
<td>Not Processed</td>
</tr>
</tbody>
</table>

### Master Promissory Notes

The Master Promissory Note (MPN) is the approved promissory note for Direct Subsidized, Unsubsidized and PLUS Loans for both parent borrowers and graduate and professional student borrowers for all schools.

Note: PLUS loans for graduate and professional student borrowers are referred to as Grad PLUS.

### Business Rules for All MPNs

1. The MPN is a legal document requiring a student/borrower to repay the funds borrowed under the Direct Loan Program.
2. No dollar amount is printed on the MPN by the school or COD.

3. The COD System will process paper and electronic MPNs for all loan types.

4. An MPN must be signed by the borrower before disbursing a Direct Loan (Subsidized, Unsubsidized or PLUS [parent and graduate student]).

5. An open MPN is valid for up to ten years from the date the MPN is received by the COD System provided that at least one actual disbursement is made within a year from the date COD received it. Otherwise, it will expire after 1 year from the date it is received.

6. Once an MPN is closed or expires, no new loans can be linked to it. A new MPN must be generated if new loan awards are created. However, all disbursements and booking activities for the loans already linked to the closed or expired MPN continue to be processed by the COD System.

Please refer to the topic entitled “Closing MPNs” for more information.
Business Rules Specific to PLUS MPN

1. The PLUS MPN is to be used for PLUS processing.

2. The PLUS MPN is for one or more PLUS loans that one parent borrows for one student, or one graduate student borrows for his or herself.

3. The parent or graduate student borrower can have multiple PLUS MPNs on the COD System. The parent’s MPNs may be for the same or for different students for the same or subsequent academic years. Please see Example 1 below.

4. A student can have multiple parents borrow PLUS loans for the same or subsequent academic years. Please see Example 2 below.

5. The student associated on a PLUS loan cannot be the endorser for that same PLUS award.

6. The PLUS MPN has a borrower type indicator at the top that must be completed. If “I am a Graduate/Professional Student” is checked, Section C: Dependent Undergraduate Student Information will be blank.

7. Once a PLUS borrower signs a PLUS MPN, the borrower authorizes the COD System to perform an initial credit check and future credit checks for awards made under that MPN, without requiring subsequent authorization. Thus, multiple credit decisions can be associated with one MPN.

8. The Borrower’s Rights and Responsibilities have been incorporated into the PLUS MPN and is no longer a separate document.

Example 1: Parent borrower with multiple MPNs for multiple students
Parent James Smith has two students (Jack and Jill) attending school during the same Award Year (2019-2020). James Smith signs a PLUS MPN for student Jack Smith for 2019-2020 and signs a separate PLUS MPN for student Jill Smith for 2019-2020.

Example 2: Student with multiple MPNs for multiple parent borrowers
Student Jack is attending school and multiple parents are helping to fund his education. Jack’s father, James Smith, borrows a PLUS loan and signs an individual PLUS MPN for Jack Smith. In addition, Jack’s stepfather, Robert Jones, borrows a PLUS loan for Jack and signs a separate PLUS MPN. Thus, there are two MPNs on the COD System associated with Jack for the same Award Year, 2019-2020, for different parent borrowers.
Master Promissory Note Features

All MPNs are processed using the multi-year (MY), single-year (SY), or, in the case of certain PLUS and Grad PLUS loans, single-loan (SL) feature. Each feature is discussed in more detail below.

Multi-Year MPN Feature

Unless a school is specifically informed otherwise, all US Direct Loan schools may allow their student borrowers (Subsidized/Unsubsidized /Grad PLUS) and their parent borrowers (PLUS) to receive loans for subsequent academic years based upon a previously signed MPN. Foreign schools are not eligible for this option.

Business Rules

1. The MY feature applies to all loan types. (Subsidized, Unsubsidized, and PLUS [parent and graduate student borrower]).

2. The MY feature has been expanded to include Direct Loan schools that are not four-year colleges or graduate or professional schools.

3. Schools that used the single-year feature in the previous award year will be identified in the COD System as using the single-year feature of the MPN for the purpose of linking loans for the current award year if they do not inform COD School Relations of their desire to use the multi-year feature of the MPN.

4. New schools to the Direct Loan program that are eligible for the MY feature under the expanded authority for multi-year use of the MPN will be defaulted to use the MY feature in the COD System.

5. Multiple loans for a borrower are linked to the same MPN across schools and academic years.
   a. Multiple Subsidized and Unsubsidized loans for a borrower are linked to the same MPN across schools and academic years.
   b. Multiple PLUS loans for a borrower are linked to the same PLUS MPN across schools and academic years.
   c. Multiple Grad PLUS loans for a borrower are linked to the same PLUS MPN across schools and academic years.

6. A school using the MY feature can use any MPN accepted by the COD System (even if that MPN was signed before the effective date of the expanded authority for multi-year use of the MPN).

7. Schools using the MY feature must have a confirmation process in place.
8. The COD System allows schools eligible for the MY feature to opt between the MY feature and the SY feature.

**Schools Opting for Single-Year MPN Feature**

Schools eligible for the Multi-Year (MY) feature may choose to use the Single-Year (SY) feature of the MPN.

**Business Rules**

1. When a school opts to process MPNs using the MY or SY feature, the feature selected applies to all Direct Loans processed by the school (Subsidized, Unsubsidized and PLUS [parent and graduate student borrower] loans).
   - a. All loans are processed using the SY feature OR all loans are processed using the MY feature.

2. If an eligible school opts to change the SY/MY feature, the change applies only to MPNs received at COD after the change is processed on the COD System.

3. Awards received after the date the option is changed link to an MPN using the newly selected option.

4. Schools must contact COD School Relations to change their SY/MY feature.

**Single-Year MPN Feature**

The single-year (SY) MPN feature requires that a new MPN be completed by a borrower for each academic year. All schools NOT eligible to process MPNs using the MY feature must use the SY feature. Schools eligible for the MY feature may opt to process MPNs using the SY feature as discussed in the previous section.

**Business Rules**

1. The SY feature of the MPN is available to all schools.

2. All schools NOT eligible to process MPNs using the MY feature must use the SY feature. Therefore, the COD System does not allow these schools to change this processing feature.

3. Under SY feature a new MPN must be generated each academic year for each student.

4. A SY school must use an MPN generated at or for that school only.

5. A SY school can link multiple loans for the same academic year, for the same borrower, to the same MPN.

6. The academic year start and end dates must be the same on all loan records from the single year school linked to a specific MPN under the SY feature.
7. When a school eligible for the MY feature opts to use the SY feature, the school must update its option on the COD Web site.

**Single-Loan MPN Feature (PLUS and Grad PLUS Only)**

The single-loan (SL) MPN is an MPN linked to a PLUS or Grad PLUS loan that is accepted with an Endorser with an approved credit decision. Once an Endorser is associated with a PLUS or Grad PLUS loan, the MPN linked to that PLUS or Grad PLUS loan cannot be linked to any other loans even if the school processes MPNs using the MY feature.

**Business Rules**

1. An MPN for a PLUS or Grad PLUS loan becomes an SL MPN under the following conditions:
   a. An endorser is obtained because the borrower has received an adverse credit decision,
   b. The award receives an approved credit decision for the endorser, AND
   c. The award is linked to the PLUS MPN.

2. When a PLUS or Grad PLUS Loan with an Endorser is linked to an MPN, the COD System returns an MPN Status of Inactive on the Response. However, this MPN is flagged by the COD System as a Single Loan (SL MPN) so that no further loans can be linked to this note.

3. Once an SL MPN is established, it becomes an inactive MPN and no other awards will be linked to that same MPN.

4. Once an SL MPN is established, all other pending and active PLUS MPNs for the borrower become inactive, including the SL MPN.

5. When a PLUS or Grad PLUS loan with an endorser is linked to an MPN, the MPN Status displayed on any future ISIRs will be Inactive.

6. If the borrower wants to borrow a subsequent PLUS or Grad PLUS loan a new MPN must be generated and signed.

**Electronic Master Promissory Notes (e-MPN)**

Schools can choose whether or not to use the e-MPN for their borrowers.

**Business Rules**

1. All participating Direct Loan schools are set to e-MPN Participant by default. Schools who do not wish to participate in the e-MPN process can change their e-MPN Participant designation from "Y" to "N" on the School Options Update page in COD.
a. Schools can control when their students may sign an
MPN for their school by updating the Loan
Origination Required (LOR) designation on the
School Options Update page in COD.

2. If a school uses the e-MPN, there is no need to print a
paper version of the MPN unless a borrower specifically
asks for one.

a. If a borrower wants to sign a paper MPN, that option
must be available to them.

b. If a borrower requests a paper MPN, blank MPN
forms are available for download and printin
from DLMPNsandComms.pdf (ed.gov)

3. The Direct Loan Program has an e-MPN available for
both Subsidized/Unsubsidized (Stafford) and PLUS
loans.

4. When borrowers complete an e-MPN, a Promissory Note
Response is sent to the school the borrower selected while
completing the e-MPN.

**Master Promissory Note Printing Process**

The Master Promissory Note (MPN) printing process is the responsibility
of the school. The COD System no longer prints paper MPNs and the
COD MPN Print school option is no longer available on COD Web.
Schools who don’t wish to print MPNs have the following options:

1) Use electronic process available on StudentAid.gov

2) Print a paper copy from COD Web. A fresh copy must be printed
each time from the Web site to ensure the alignment is appropriate for
processing. Don’t make copies of the printed version.

**Business Rules**

1. Obtaining a signed MPN is the responsibility of the
school.

a. All Direct Loan schools are set to participate in the
eMPN process by default. Schools who do not wish
to participate in the eMPN process can change their
eMPN Participation designation from "Y" to "N" on
the School Options Update page in COD.

b. The borrower can complete an electronic MPN on
StudentAid.gov or a paper MPN. However,
borrowers must be allowed the option of signing a
paper MPN.
i. When a borrower completes the eMPN process, a Promissory Note Response is sent to the appropriate school.

c. A PLUS borrower can complete an eMPN or a paper PLUS MPN for a PLUS Loan.

d. A Grad PLUS borrower can complete an eMPN or a paper PLUS MPN for a Grad PLUS loan.

2. When a school is responsible for the MPN printing process, the school can print the MPNs.

   a. Completed MPNs must be mailed to the Promissory Note processing center.

   b. All signed Promissory Notes must be listed on a signed manifest that is mailed to the Department of Education

   c. MPNs sent via regular mail should be mailed to the following address:

       US Department of Education
       P.O. Box 9002
       Niagra Falls, NY 14302

   d. MPNs sent via overnight, express, or certified mail should be mailed to the following address:

       U.S. Department of Education
       2429 Military Road
       Suite 200
       Niagara Falls, NY 14304

   e. Upon receipt of MPNs, the notes are screened for completeness.

   f. Incomplete or illegible MPNs are returned to the school for correction.

   g. Accepted MPNs generate a Promissory Note Response to be sent to the school.

   h. Schools creating their own paper MPN form instead of using Department created paper MPN forms must have them tested and approved first. Schools can submit paper MPNs for COD testing and review by sending them to:

       US Department of Education
       P.O. Box 9002
       Niagra Falls, NY 14302

---

**Submitting Test Documents**

All documents and shipping packages submitted for testing should be clearly marked “For Testing Only.”
3. The PLUS MPN for Parent PLUS and Grad PLUS awards contains language authorizing COD to perform an initial and subsequent credit checks for the PLUS and Grad PLUS borrower. Additional authorization is not required for subsequent credit checks.

4. A school does not print a dollar amount on the MPN.

5. An MPN ID is generated for each MPN and printed/displayed on the MPN. (See below for details of the Sub/Unsub and PLUS MPN ID).

**Business Rules Specific to Creating the Subsidized/Unsubsidized MPN ID**

1. The Subsidized/Unsubsidized MPN ID is 21-characters. A Subsidized/Unsubsidized MPN ID contains an ‘M’ in the 10th position. The components for the Subsidized/Unsubsidized MPN ID are:

   a. Student’s Social Security Number: 001010001–999999998

   b. MPN Indicator: M

   c. Award Year: For the 2021-2022 Award Year, this should equal 22.

   When generating the MPN ID the COD System increments the award year in the MPN ID by one each year. For all MPN IDs created on StudentAid.gov after the implementation of the 2021-2022 software, the award year in the MPN ID is 22.

   d. Direct Loan School Code: X00000–X99999 where X = G or E.

   The school code imbedded in the MPN ID continues to be the DL school code (G or E code) and does not use the Routing Number (Common School Identifier).

   e. MPN Sequence Number: 001–999

2. The MPN ID is used by the COD System to identify which Subsidized/Unsubsidized awards are linked to an MPN.

**Example: Subsidized/Unsubsidized MPN ID**

An MPN ID for a subsidized/unsubsidized MPN may look like:

<table>
<thead>
<tr>
<th>Social Security Number</th>
<th>Sub/Unsub MPN Indicator</th>
<th>Award Year</th>
<th>Direct Loan School Code</th>
<th>MPN Sequence Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>999999999</td>
<td>M</td>
<td>22</td>
<td>G12345</td>
<td>001</td>
</tr>
</tbody>
</table>

For more details on this response process, refer to the topic entitled *Generating an MPN Response.*
Business Rules Specific to Creating the PLUS MPN ID

1. The PLUS MPN ID is 21-characters. A PLUS MPN ID contains an ‘N’ in the 10th position. The components for the PLUS MPN ID are:
   a. Student’s Social Security Number: 001010001–999999998
   b. MPN Indicator: N
   c. Award Year: For the 2021-2022 Award Year, this should equal 22.
      i. When creating the MPN ID the COD System increments the award year in the MPN ID by one each year. For all MPN IDs created on StudentAid.gov after the implementation of the 2021-2022 software, the award year in the MPN ID is 22.
   d. Direct Loan School Code: X00000–X99999 where X = G or E.

   The school code imbedded in the MPN ID continues to be the DL school code (G or E code) and does NOT use the Routing Number (Common School Identifier).

   MPN Sequence Number: 001–999

2. The MPN ID is used by the COD System to identify which PLUS awards are linked to an MPN.

Example: PLUS MPN ID

An MPN ID for a PLUS MPN may look like:

<table>
<thead>
<tr>
<th>999999999</th>
<th>N</th>
<th>22</th>
<th>G12345</th>
<th>001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Security Number</td>
<td>PLUS MPN Indicator</td>
<td>Award Year</td>
<td>Direct Loan School Code</td>
<td>MPN Sequence Number</td>
</tr>
</tbody>
</table>

3. The MPN ID is used by the COD System to identify which PLUS awards are linked to an MPN.

4. When printing the PLUS MPN, the borrower type indicator must be completed under Section A: Borrower Information. The borrower type indicator is worded:

CHECK ONE – I am a:

- Graduate or Professional Student
• Parent of a Dependent Undergraduate Student

5. If Graduate or Professional Student is checked, the following is left blank:
   a. Section C: Dependent Undergraduate Student Information, numbers 14, 15, and 16
   b. Section A: Borrower Information, number 7

6. Schools printing Promissory Notes can either
   a. Print using the appropriate approved form
   or
   b. Print all text including data and data labels using the same format and wording as the form provided by the Department of Education.

7. To obtain approved PLUS MPN forms contact FSA Pubs.

8. When printing Promissory Notes, it is recommended to use Courier, 10 point, 12 pitch font.

9. When mailing the MPN, a number 10 business window envelope is recommended.

10. The PLUS MPN print specifications are provided in Volume VI, Section 6 – Print Specifications and Forms

**Linking an MPN to a Direct Loan**

**Subsidized/Unsubsidized Grad PLUS or PLUS Award**

The COD System links Direct Loan Subsidized/Unsubsidized and PLUS (parent and graduate student borrower) awards to an active MPN for that Borrower.

**Business Rules**

1. When linking an award to an MPN, if multiple valid MPNs exist for a student, the award is linked to the MPN with the greatest expiration date.

2. The COD Web site displays the MPN expiration date to assist schools in determining if the borrower has an active MPN available on the COD System

3. The MPN Expiration Date displays for all MPNs for Subsidized/Unsubsidized awards, and for PLUS awards.

4. The COD System does not link an MPN to a loan if the loan amount and all actual and anticipated disbursements equal zero.
5. The COD System initiates an MPN linking process when an award amount on an unlinked award is increased from zero.

**Business Rules Specific to Linking the Subsidized/Unsubsidized MPN**

1. The COD System links an accepted Subsidized/Unsubsidized award to a valid MPN using the following student data elements:
   a. Current SSN, AND
   b. Date of Birth, AND
   c. First two characters of the first name OR the first two characters of the last name, if the first name is blank.

2. When a Subsidized/Unsubsidized Award is accepted and a valid MPN is already on file, the MPN and award are linked.
   a. The MPN Status, MPN Link Indicator, MPN ID and Electronic MPN Indicator are generated on an Award Response.

3. When a Subsidized/Unsubsidized Award is accepted and no valid MPN is on file, the award is not linked and the MPN Status Code on the Award Response equals R (valid MPN not on file at COD).

4. When a Subsidized/Unsubsidized Award is NOT accepted and there is a valid MPN on file, the Award will not be linked to the MPN. The MPN Link Indicator of false and the appropriate MPN Status Code (P= Pending or R = Rejected) will be returned in the Award Response.

5. When an MPN is received and an accepted Subsidized/Unsubsidized award is already on file and not yet linked to an MPN, the MPN and the award are linked.
   a. The MPN Status, MPN Link Indicator, MPN ID and Electronic MPN Indicator will be generated on an MPN Response for the Subsidized/Unsubsidized award.

6. When an MPN is received and no accepted Subsidized/Unsubsidized award is already on file, the MPN is not linked and an unsolicited Promissory Note Response is generated.

7. If a valid MPN is on file and an accepted Subsidized/Unsubsidized award does not link (MPN Status Code = P, Pending), the student identifier information on the award does not match the student identifier information on the MPN. See EXAMPLE below.

---

*Schools should encourage students to list the same Person Identifier information (i.e. complete formal name) used to file the Free Application for Federal Student Aid (FAFSA®) on applications for all types of financial aid. An accepted award and valid MPN will not link if the Person Identifier information differs on the award and MPN. See EXAMPLE below.*
below. Schools should compare the student identifier information listed on the award and MPN, and perform the following actions:

a. Update the student identifier information listed on the award origination via batch or web.

b. Inactivate the loan by reducing the award amount and all anticipated disbursements to zero ($0.00). Originate a new award with student identifier information that matches that of the MPN.

**Example**

Student Robert Adams files a Free Application for Federal Student Aid (FAFSA®) using his given name. The student identifier information Robert lists on the FAFSA® is pulled from CPS to create a valid MPN. The student identifier information on the MPN is as follows:

```xml
<Student>
  <Index>
    <SSN>999931101</SSN>
    <BirthDate>1987-04-15</BirthDate>
    <LastName>ADAMS</LastName>
  </Index>
  <PersonIdentifiers>
    <SSN>999931101</SSN>
  </PersonIdentifiers>
  <Birth>
    <BirthDate>1987-04-15</BirthDate>
  </Birth>
  <Name>
    <FirstName>ROBERT</FirstName>
    <LastName>ADAMS</LastName>
  </Name>
</Student>
```

Robert then applies for a loan using his common first name, Bob. The student identifier information on the award is as follows:

```xml
<Student>
  <Index>
    <SSN>999931101</SSN>
    <BirthDate>1987-04-15</BirthDate>
    <LastName>ADAMS</LastName>
  </Index>
  <PersonIdentifiers>
    <SSN>999931101</SSN>
  </PersonIdentifiers>
  <Birth>
    <BirthDate>1987-04-15</BirthDate>
  </Birth>
  <Name>
    <FirstName>BOB</FirstName>
    <LastName>ADAMS</LastName>
  </Name>
</Student>
```

The COD System attempts to match the student identifier information contained on the award with the student identifier information of a valid MPN on file at COD. Since the first two letters of the student’s first name listed on the award do not match the first two letters of the student’s first name listed on the MPN, the award and MPN do not link. The COD System is unable to find the appropriate MPN with which to
link the award, and returns the MPN Status Code of X (Pending) on the Award Response.

**Business Rules Specific to Linking the PLUS MPN for Parent and Graduate Student Borrowers**

1. The COD System links an accepted PLUS award to a valid MPN using the following borrower (parent) and student data elements. For Grad PLUS, the COD System links an accepted PLUS award to a valid MPN using the borrower (graduate student) and student data elements:
   a. Current SSN,
   b. Date of Birth, AND
   c. First two characters of the first name OR the first two characters of the last name, if the first name is blank.

2. Regardless of whether the award is linked or not linked to an MPN, a PLUS Award Response is not sent to a school until a credit decision status (Accepted, Pending or Denied) is received.
   a. If the credit decision for a PLUS award is pending or denied, the MPN Status on the Award Response equals R (Rejected MPN or valid MPN not on file at COD), even when there is a valid MPN.
   b. If the credit decision for a PLUS award is accepted, the MPN Status on the Award Response is either ‘MPN on file’ or ‘MPN not on file’ depending on whether there is a valid MPN on file at COD.

3. When a PLUS Award with a positive credit decision is accepted and a valid PLUS MPN is already on file, the PLUS MPN and PLUS award are linked.
   a. The MPN Status, MPN Link Indicator, MPN ID and Electronic MPN Indicator are generated on an Award Response for the PLUS award.

4. When a PLUS Award with a positive credit decision is NOT accepted and a valid PLUS MPN is already on file, the PLUS MPN and PLUS Award are not linked.
   a. The MPN Link Indicator of false and the appropriate MPN Status Code (P = Pending or R = Rejected) is returned in the Award Response.

5. When a positive credit decision is received for an Endorser and an accepted award and accepted MPN (one that is not yet linked to any awards) is already on file, the award is linked to the PLUS MPN and the PLUS MPN becomes a Single-Loan MPN.

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For Grad PLUS, the current SSN, Date of Birth, and First Name submitted for the student must match the values submitted for the borrower on the award. If there is not an exact match on any of the fields, the award will not be recognized as a Grad PLUS award and will not link to a Grad PLUS MPN.

For parent PLUS, schools should encourage both parents and students to list the same Person Identifier information (i.e. complete formal names) used to file the FAFSA® for a PLUS loan application. An accepted award and valid PLUS MPN does not link if either the borrower or student identifier information on the award differs from that on the PLUS MPN. See EXAMPLE below.

Please refer to the topic entitled "Single-Loan MPN" for more information.
a. The PLUS MPN Status, MPN Link Indicator, MPN ID, Electronic MPN Indicator and Endorser Amount, if applicable, are sent to the school on a Credit Status Response and an unsolicited MPN Response is NOT generated.

6. When a PLUS MPN is received and an accepted award with a positive credit decision is already on file and not yet linked to an MPN, the PLUS MPN and the PLUS award are linked.

   a. The MPN Status, MPN Link Indicator, MPN ID, and Electronic MPN Indicator are sent to the school on a MPN Response.

7. If a valid PLUS MPN already on file does not link to an accepted award with a positive credit decision, the student and/or borrower identifier information on the award does not match the student and/or borrower identifier information on the PLUS MPN. Please see example below. Schools should compare all Person Identifier information listed on the award and PLUS MPN, and perform the following actions:

   a. Update the student and/or borrower identifier information listed on the award origination via batch or web.

   b. Inactivate the loan by reducing the award amount and all anticipated disbursements to zero ($0.00). Originate a new award with student identifier information that matches that of the MPN.

**Example**

Parent William Adams decides to take out a PLUS loan for his son John. William and John file a FAFSA® and list William’s given name. The borrower identifier information on the PLUS MPN is as follows:

```
<Borrower>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1953-05-19</BirthDate>
    <LastName>ADAMS</LastName>
  </Index>
  <PersonIdentifiers>
    <SSN>123456789</SSN>
  </PersonIdentifiers>
  <Birth>
    <BirthDate>1953-05-19</BirthDate>
  </Birth>
  <Name>
    <FirstName>WILLIAM</FirstName>
    <LastName>ADAMS</LastName>
  </Name>
</Borrower>
```

William then applies for a PLUS loan using his common first name, Bill. The borrower identifier information on the award is as follows:

```
<Student>
  <Index>
    <SSN>123456789</SSN>
    <BirthDate>1953-05-19</BirthDate>
    <LastName>ADAMS</LastName>
  </Index>
  <PersonIdentifiers>
    <SSN>123456789</SSN>
  </PersonIdentifiers>
  <Birth>
    <BirthDate>1953-05-19</BirthDate>
  </Birth>
  <Name>
    <FirstName>WILLIAM</FirstName>
    <LastName>ADAMS</LastName>
  </Name>
</Student>
```
The COD System attempts to match the borrower identifier information contained on the award with the borrower identifier information of a valid PLUS MPN on file at COD. Since the first two letters of the borrower’s first name on the award do not match the first two letters of the borrower’s first name listed on the PLUS MPN, the award and PLUS MPN do not link. The COD System is unable to find the appropriate PLUS MPN with which to link the award, and returns the MPN Status Code of P (Pending) on the Award Response.

**Example**
Robert Smith decides to take out a Grad PLUS loan. Robert files a FAFSA® and lists his given name. The borrower identifier information on the PLUS MPN is as follows:

```xml
<Index>
  <SSN>123456789</SSN>
  <BirthDate>1953-05-19</BirthDate>
  <LastName>ADAMS</LastName>
</Index>
<PersonIdentifiers>
  <SSN>123456789</SSN>
</PersonIdentifiers>
<Birth>
  <BirthDate>1953-05-19</BirthDate>
</Birth>
<Name>
  <FirstName>BOB</FirstName>
  <LastName>ADAMS</LastName>
</Name>
```

Robert then applies for a Grad PLUS loan using his common first name, Bob. The borrower identifier information on the award is as follows:

```xml
<Index>
  <SSN>123456789</SSN>
  <BirthDate>1953-05-19</BirthDate>
  <LastName>SMITH</LastName>
</Index>
<PersonIdentifiers>
  <SSN>123456789</SSN>
</PersonIdentifiers>
<Birth>
  <BirthDate>1953-05-19</BirthDate>
</Birth>
<Name>
  <FirstName>BOB</FirstName>
  <LastName>SMITH</LastName>
</Name>
```
The COD System attempts to match the Grad PLUS borrower identifier information contained on the award with the borrower identifier information of a valid PLUS MPN on file at COD. Since the first two letters of the borrower’s first name on the award do not match the first two letters of the borrower’s first name listed on the PLUS MPN, the award and PLUS MPN do not link. The COD System is unable to find the appropriate PLUS MPN with which to link the award, and returns the MPN Status Code of P (Pending) on the Award Response.

**Multi-Year (MY) Feature Linking Business Rules**

1. The MY feature allows multiple awards for different academic years from the same or different MY schools to link to the same MPN.

2. The COD System applies the MY feature only to schools eligible for the MY feature.

3. When the borrower has more than one MPN on file with the same expiration date, the COD System links incoming awards to the MPN with the latest received date by the COD System (when the receive dates are different).

4. The COD System links the award to the MPN only if the Award Begin Date on the award is prior to or equal to the MPN expiration date.

5. An inactive or closed MPN is no longer eligible for processing. This means no other awards can be linked to the MPN once it is inactive or closed.
   
   a. The exception to this rule would be if an award is received with an Award Begin Date prior to the MPN expiration date and the award is NOT inactive due to a pending bankruptcy discharge or an unauthorized signature discharge. Then, the award will be linked to the MPN; however, the MPN remains inactive.

**Single-Year (SY) Feature Linking Business Rules**

1. The SY feature allows one or more PLUS (parent and student borrower) awards with the same academic year from the same school to link to the same PLUS MPN.

2. PLUS (parent and student borrower) awards from the same school with different academic years may not be linked to the same PLUS MPN.

3. The SY feature allows one or more subsidized or unsubsidized awards with the same academic year from the same school to link to the same MPN.
4. Subsidized and Unsubsidized awards from the same school with different academic years may not be linked to the same MPN.

5. The COD System must match the Direct Loan School Code on the Award ID with the school code in the 21-character MPN ID.

6. For the purpose of linking, the COD System establishes the academic year period used for an MPN to be the academic year start and end dates of the first award linked to the MPN.

7. The COD System links subsequent awards to the MPN if the academic year start and end dates are the same as those of the first award linked to the MPN.

Single-Loan MPN Linking Business Rules (for PLUS and Grad PLUS only)

1. A PLUS MPN becomes a single-loan MPN under the following conditions:
   a. The PLUS MPN has no other awards linked to it,
   b. An endorser is obtained because the borrower has received an adverse credit decision,
   c. The award receives an approved credit decision for the endorser, and
   d. The award is linked to the PLUS MPN.

2. Once a single-loan MPN is established, no other awards are linked to that same MPN.

3. The expiration date for a single-loan MPN is the date that the COD System assigns the single-loan flag to the MPN.

4. Once a single-loan MPN is established, all other pending and active PLUS MPNs for the borrower become inactive, including the SL MPN. Thus, if the borrower wants to borrow a subsequent PLUS or Grad PLUS loan a new MPN must be generated and signed.

5. The COD System rejects with error code 113 any disbursements that exceed the endorser amount on the award linked to a single-loan MPN since the endorser is responsible for no more than the PLUS or Grad PLUS Loan amount on the Endorser Addendum.

6. On an award linked to a single-loan MPN, the Award Amount can be decreased.
7. The COD System sends to the PLUS or Grad PLUS borrower with a denied credit decision, an Endorser Addendum and a new PLUS MPN unless a pending PLUS MPN is on file. (A pending MPN is one that is not yet linked to an award.)

8. If the borrower elects to have an endorser, a PLUS MPN is needed on file to link the award to once the endorser is approved. When the award is linked, the MPN becomes a single-loan MPN.

9. If the borrower elects to have an endorser, the award can be linked to the pending PLUS MPN once an approved endorser credit decision is received.

Generating an Expiration Date for an MPN

The MPN expiration date calculation performed by the COD System for all MPNs is based on MPN expiration date regulations.

Business Rules

1. For a pending MPN (one that does not yet have an award linked to it), the expiration date is calculated as the date the MPN is received by COD for processing plus one year.

2. For an MPN that has been linked but has no award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus one year.

3. For an MPN that has been linked and has at least one award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 10 years.

4. For an MPN associated with a discharged loan, the expiration date is calculated as the discharge date, unless the expiration date precedes the discharge date.

5. The MPN expiration date and the date an MPN is received by COD are viewable on the COD Web site.

6. The COD System accepts a disbursement with a Disbursement Release Indicator = true for any award linked to an MPN even if the MPN has expired only when the following two conditions are met:
   a. The award is already linked to the MPN, AND
   b. The disbursement successfully passes all other disbursement edits for being accepted by the COD System.

7. The COD System accepts disbursements for any award already linked to an expired MPN provided the disbursement passes all other edits.
Direct Loan Award and Disbursement Process

a. If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is on or before the MPN expiration date, the MPN expiration date is recalculated using the date the MPN was received at COD for processing plus 10 years and the MPN is reactivated (Accepted Status).

b. If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is after the MPN expiration date, the MPN expiration date remains unchanged and the MPN status remains inactive.

c. If an accepted subsequent disbursement is not the first actual disbursement under the MPN, the MPN expiration date remains unchanged and the MPN status stays the same.

8. The COD System sends unsolicited MPN Acknowledgements to all schools associated with the MPN each time the MPN Expiration Date changes. The MPN Acknowledgement will include the <MPNExpirationDate> tag. This applies for ALL award years. Note: MPN Acknowledgements are not sent for discharge or discharge reversals.

Closing MPNs

To close an MPN (Subsidized/Unsubsidized or PLUS) a borrower must send a written request to his/her servicer. If a school receives a written request from a borrower, the request should be sent to the COD School Relations Center. The borrower must put their request in writing.

Business Rules

1. Upon receipt of a written request from the borrower:
   a. COD Customer Service manually closes an MPN via the COD Web site.
   
   b. When an MPN is closed, a confirmation letter is sent to the borrower.

2. No new awards can be linked to a closed MPN.

3. Awards that are already linked to a closed MPN can continue to use that MPN for the disbursement processing.

4. A closed MPN is reopened by the COD System only if the MPN was closed in error by COD.

5. An MPN that is reopened goes back to the MPN Status to which the note was assigned prior to being closed.
Generating a Master Promissory Note Response

A Master Promissory Note Response is generated by COD and sent to a school to provide the status of an MPN for Subsidized/Unsubsidized, Grad PLUS and PLUS loans.

The COD System sends MPN responses to all schools associated with an MPN. A school is associated with an MPN when it has a loan linked to that MPN and/or it is the school specified on the MPN.

MPN Responses also contain an MPN expiration date data element. The MPN expiration date will be transmitted in the `<MPNExpirationDate>` tag. This applies to ALL award years.

Business Rules

1. MPN Responses are sent to the Attended school.

2. MPN Acknowledgements won’t be sent to a school under the following conditions:
   a. The loan(s) from that school linked to the MPN has (have) been reduced to $0.
   b. The school has confirmed that it has completed processing (confirmed closeout) for the Direct Loan award year indicated on the MPN or in the loan record(s) from that school and the school has no award linked to that MPN in a year that is still “open.”
   c. FSA has confirmed that the school has completed processing (confirmed closeout for the school) for the Direct Loan award year indicated on the MPN or in the loan record(s) from that school and the school has no award linked to that MPN in a year that is still “open.”
   d. The date is beyond the established annual data submission deadline (closeout deadline) for the Direct Loan award year indicated on the MPN or in the loan record(s) from that school and the school isn’t on Extended Processing and the school has no award linked to that MPN in a year that is still “open.”
      i. The established data submission deadline for Direct Loans is usually the last business day in July of the year following end of the award year.

3. Schools will receive MPN Responses when the conditions above don’t exist and:
   a. COD accepts an MPN and there are no existing awards.
b. COD accepts an MPN and at least one award exists. The award(s) and MPN link.

c. COD accepts an award and the MPN exists. The award and the MPN link.
   i. The MPN Response is sent to the school where the award originated.
   ii. In this case, an MPN Response will only be sent to all associated schools if the linking results in an MPN Expiration Date change.

d. The MPN Expiration Date changes due to:
   i. The acceptance of an actual disbursement within a year of COD’s receiving the MPN.
   ii. COD is notified that a loan associated with the MPN has been discharged due to death, unauthorized signature/unauthorized payment, or identity theft.

e. The MPN Response will be sent to all schools associated with the MPN that have active awards (Award Amount and Disbursement Amounts > $0) or were listed on the MPN.
   i. If the school specified on the MPN is the same as the school where an active award originated, the school will not receive a separate response.
   ii. MPN responses sent to schools that do not have an award linked to their MPN, but the MPN is linked to an award from another school, will not receive the <MPNLinkIndicator> tag.

f. Award (active or inactive) and MPN exist on COD System and are unlinked. The MPN and award are manually linked.
   i. The MPN Response will be sent to the school where the award was originated.
   ii. If the linking results in the expiration date of the MPN changing, all associated schools will receive an MPN Response.

g. Award and MPN exists on COD System and are unlinked. MPN and award are linked through Standard Student Identification Method (SSIM).
   i. SSIM is a weekly process in which COD links MPNs to Awards which may not have linked upon submission.
ii. The MPN Response will be sent to the school where the award was originated.

iii. If the linking results in the expiration date of the MPN changing, all associated schools will receive an MPN Response.

h. When an MPN expiration date changes the COD system will send MPN Acknowledgement to all associated schools.

i. MPN Responses sent to schools that do not have an Award linked to their own MPN, but the MPN is linked to an award at a different school, will not receive the \texttt{<MPNLinkIndicator>} tag.

4. A COD system-generated MPN Response contains a Document Type of \texttt{PN}. The Document Type indicates the type of Response.

5. A Response Document of Document Type \texttt{PN} contains a system-generated Document ID.

6. An MPN Response contains the following data elements in the Response complex element \texttt{<Response>}:

   a. Document Status, \texttt{<DocumentStatusCode>}
   
   b. Document Type, \texttt{<DocumentTypeCode>}
   
   c. Processing Date, \texttt{<ProcessDate>}

7. In addition, the following data elements are in the MPN Response:

   a. Award ID, \texttt{<AwardID>}
   
   b. MPN Status, \texttt{<MPNStatusCode>}
   
   c. MPN Link Indicator, \texttt{<MPNLinkIndicator>}
   
   d. MPN ID, \texttt{<MPNID>}
   
   e. Electronic MPN Indicator \texttt{<EMPNIndicator>} is part of the Response if an electronic MPN is filed by the borrower.
   
   f. MPN Expiration Date, \texttt{<MPNExpirationDate>}

\begin{quote}
The COD System does not generate Responses when an MPN is manually unlinked from an award or an MPN is unlinked due to a re-link of an award. No Response will be sent for a newly unlinked MPN if the expiration date is changed from "MPN Promissory Note Date/Signed field (MPN Received Date) + 365" to "MPN Promissory Note Date/Signed field (Received Date) + 365".
\end{quote}
8. A Pending MPN is an accepted MPN, which cannot yet be linked with a loan award record. (No accepted Origination record on file.)

9. An e-MPN Indicator = true on an MPN Response identifies that the MPN was completed electronically.

Examples
Below is a sample DL Sub/Unsub MPN Response:

```
O*N05TG01005       ,CLS=CRPN22OP,XXX,BAT=000000000000000000002017-04-13T22:29:51.0100000001,
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
    xmlns:xsd="http://www.w3.org/2001/XMLSchema"
    xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
    xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
    <TransmissionData>
        <CreatedDateTime>2017-04-13T18:58:49.72</CreatedDateTime>
        <Source>
            <COD>
                <RoutingID>00000001</RoutingID>
            </COD>
        </Source>
        <Destination>
            <School>
                <RoutingID>10000403</RoutingID>
            </School>
        </Destination>
        <FullResponseCode>F</FullResponseCode>
    </TransmissionData>
    <ReportingSchool>
        <RoutingID>10000403</RoutingID>
        <AttendedSchool>
            <RoutingID>10000403</RoutingID>
            <Student>
                <Index>
                    <SSN>999900345</SSN>
                    <BirthDate>1968-06-27</BirthDate>
                    <LastName>DOE</LastName>
                </Index>
                <Name>
                    <FirstName>JACKIE</FirstName>
                    <MiddleInitial>M</MiddleInitial>
                </Name>
                <DLUnsubsidized>
                    <AwardKey>1</AwardKey>
                    <FinancialAwardYear>2022</FinancialAwardYear>
                    <FinancialAwardNumber>1</FinancialAwardNumber>
                    <Response>
                        <ResponseCode>A</ResponseCode>
                        <EMPNIndicator>true</EMPNIndicator>
                        <MPNID>999900345M22G00121001</MPNID>
                        <MPNStatusCode>P</MPNStatusCode>
                        <MPNLinkIndicator>false</MPNLinkIndicator>
```
Below is a sample DL Unsub Linked MPN Response:

  <TransmissionData>
    <DocumentID>2017-12-01T16:09:08.0000000001</DocumentID>
    <CreatedDateTime>2017-12-01T16:13:20.20</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000033</RoutingID>
      </School>
      <FullResponseCode>F</FullResponseCode>
    </Destination>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>10000033</RoutingID>
  </ReportingSchool>
  <AttendedSchool>
    <RoutingID>10000033</RoutingID>
  </AttendedSchool>
  <Student>
    <Index>
      <MPNExpirationDate>2019-05-09</MPNExpirationDate>
    </Index>
  </Student>
</CommonRecord>
Below is a sample DL Grad PLUS Unlinked MPN Response:

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <Response>
    <DocumentTypeCode>PN</DocumentTypeCode>
    <ProcessDate>2017-12-01</ProcessDate>
  </Response>
</CommonRecord>
```

```
0*N05TG01005 ,CLS=CRPN18OP,XXX,BAT=000000000000000000002017-12-01T22:29:51.0100000001,
```
<TransmissionData>
  <DocumentID>2017-12-02T18:06:52.000000001</DocumentID>
  <CreatedDateTime>2017-12-02T18:09:17.40</CreatedDateTime>
  <Source>
    <COD>
      <RoutingID>00000001</RoutingID>
    </COD>
  </Source>
  <Destination>
    <School>
      <RoutingID>10000033</RoutingID>
    </School>
  </Destination>
  <FullResponseCode>F</FullResponseCode>
</TransmissionData>

<ReportingSchool>
  <RoutingID>10000033</RoutingID>
  <AtendedSchool>
    <RoutingID>10000033</RoutingID>
    <Student>
      <Index>
        <SSN>999911741</SSN>
        <BirthDate>1967-09-09</BirthDate>
        <LastName>DOE</LastName>
      </Index>
      <Name>
        <FirstName>JOHN</FirstName>
        <MiddleInitial>P</MiddleInitial>
      </Name>
    </Student>
    <DLPLUS>
      <AwardKey>1</AwardKey>
      <FinancialAwardYear>2022</FinancialAwardYear>
      <FinancialAwardNumber>1</FinancialAwardNumber>
      <Borrower>
        <Index>
          <SSN>999911741</SSN>
          <BirthDate>1967-09-09</BirthDate>
          <LastName>DOE</LastName>
        </Index>
        <Name>
          <FirstName>JOHN</FirstName>
          <MiddleInitial>P</MiddleInitial>
        </Name>
      </Borrower>
      <Response>
        <ResponseCode>A</ResponseCode>
        <EMPNIndicator>true</EMPNIndicator>
        <MPNID>999911741N22G00028001</MPNID>
        <MPNStatusCode>P</MPNStatusCode>
        <MPNLinkIndicator>false</MPNLinkIndicator>
        <MPNExpirationDate>2025-12-26</MPNExpirationDate>
      </Response>
    </DLPLUS>
  </AtendedSchool>
</ReportingSchool>

<Response>
  <ResponseCode>A</ResponseCode>
</Response>
</Response>
</TransmissionData>
Below is a sample DL Parent PLUS Unlinked MPN Response:

```
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <DocumentID>2017-12-02T18:06:52.0000000001</DocumentID>
    <CreatedDateTime>2017-12-02T18:09:17.40</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000033</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>P</FullResponseCode>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>10000033</RoutingID>
    <AttendedSchool>
      <RoutingID>10000033</RoutingID>
      <Student>
        <Index>
          <SSN>999911741</SSN>
          <BirthDate>1967-09-09</BirthDate>
          <LastName>DOE</LastName>
        </Index>
        <Name>
          <FirstName>JOHN</FirstName>
          <MiddleInitial>P</MiddleInitial>
        </Name>
      </Student>
    </AttendedSchool>
  </ReportingSchool>
</CommonRecord>
```
Below is a sample DL Grad PLUS Linked MPN Response:

```
0*N05TG01005 ,CLS=CRPN22OP,XXX,BAT=000000000000000000002017-12-02T22:29:51.0100000001,
```

```
```

```
<Response>
  <ResponseCode>A</ResponseCode>
  <MPNLinkIndicator>false</MPNLinkIndicator>
  <MPNExpirationDate>2019-12-26</MPNExpirationDate>
</Response>
```

```
</DLPLUS>
```

```
```

```
```

```
```

```
```

```
```

```
```

```
```

```
```

```
```
<TransmissionData>
  <DocumentID>2017-12-02T18:06:52.000000000</DocumentID>
  <CreatedDateTime>2017-12-02T18:09:17.40</CreatedDateTime>
  <Source>
    <COD>
      <RoutingID>000000001</RoutingID>
    </COD>
  </Source>
  <Destination>
    <School>
      <RoutingID>10000033</RoutingID>
    </School>
  </Destination>
  <FullResponseCode>F</FullResponseCode>
</TransmissionData>

<ReportingSchool>
  <RoutingID>10000033</RoutingID>
  <AttendedSchool>
    <RoutingID>10000033</RoutingID>
    <Student>
      <Index>
        <SSN>999911741</SSN>
        <BirthDate>1967-09-09</BirthDate>
        <LastName>DOE</LastName>
      </Index>
      <Name>
        <FirstName>JOHN</FirstName>
        <MiddleInitial>P</MiddleInitial>
      </Name>
    </Student>
    <Borrower>
      <Index>
        <SSN>999911741</SSN>
        <BirthDate>1967-09-09</BirthDate>
        <LastName>DOE</LastName>
      </Index>
      <Name>
        <FirstName>JOHN</FirstName>
        <MiddleInitial>P</MiddleInitial>
      </Name>
    </Borrower>
  </AttendedSchool>
  <FinancialAwardYear>2022</FinancialAwardYear>
  <FinancialAwardNumber>1</FinancialAwardNumber>
</ReportingSchool>

<FinancialAwardID>999911741P22G00028001</FinancialAwardID>

<FinancialAwardAmountRequested>54321.00</FinancialAwardAmountRequested>

<Borrower>
  <Index>
    <SSN>999911741</SSN>
    <BirthDate>1967-09-09</BirthDate>
    <LastName>DOE</LastName>
  </Index>
  <Name>
    <FirstName>JOHN</FirstName>
    <MiddleInitial>P</MiddleInitial>
  </Name>
</Borrower>

<Response>
  <ResponseCode>A</ResponseCode>
  <EMPNIndicator>false</EMPNIndicator>
  <MPNID>999911741N18G00028001</MPNID>
  <MPNStatusCode>A</MPNStatusCode>
  <MPNLinkIndicator>true</MPNLinkIndicator>
  <MPNExpirationDate>2025-12-26</MPNExpirationDate>
</Response>
</DLPLUS>
Below is a sample DL Parent PLUS Linked MPN Response:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
    xmlns:xsd="http://www.w3.org/2001/XMLSchema"
    xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
    xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
    <TransmissionData>
        <DocumentID>2017-12-02T18:06:52.0000000001</DocumentID>
        <CreatedDateTime>2017-12-02T18:09:17.40</CreatedDateTime>
        <Source>
            <COD>
                <RoutingID>00000001</RoutingID>
            </COD>
        </Source>
        <Destination>
            <School>
                <RoutingID>10000033</RoutingID>
            </School>
        </Destination>
        <FullResponseCode>F</FullResponseCode>
    </TransmissionData>
    <ReportingSchool>
        <RoutingID>10000033</RoutingID>
    </ReportingSchool>
    <AttendedSchool>
        <RoutingID>10000033</RoutingID>
    </AttendedSchool>
    <Student>
        <Index>
            <SSN>999911741</SSN>
            <BirthDate>1967-09-09</BirthDate>
            <LastName>DOE</LastName>
        </Index>
        <Response>
            <ResponseCode>A</ResponseCode>
        </Response>
        <Response>
            <ResponseCode>A</ResponseCode>
        </Response>
        <Response>
            <ResponseCode>A</ResponseCode>
        </Response>
        <Response>
            <ResponseCode>A</ResponseCode>
        </Response>
    </Student>
</CommonRecord>
```
Below is a sample DL Sub Linked MPN Response:

```xml
</Index>
<Name>
  <FirstName>JOHN</FirstName>
  <MiddleInitial>P</MiddleInitial>
</Name>
<DLPLUS>
  <AwardKey>1</AwardKey>
  <FinancialAwardYear>2022</FinancialAwardYear>
  <FinancialAwardNumber>1</FinancialAwardNumber>
  <FinancialAwardID>999911741P22G00033001</FinancialAwardID>
  <FinancialAwardAmountRequested>54321.00</FinancialAwardAmountRequested>
  <Borrower>
    <Index>
      <SSN>999902180</SSN>
      <BirthDate>1968-06-05</BirthDate>
      <LastName>DOE</LastName>
    </Index>
    <Name>
      <FirstName>JANE</FirstName>
      <MiddleInitial>P</MiddleInitial>
    </Name>
    <Borrower>
      <Response>
        <ResponseCode>A</ResponseCode>
        <EMPNIndicator>false</EMPNIndicator>
        <MPNID>999911741N22G00028001</MPNID>
        <MPNStatusCode>A</MPNStatusCode>
        <MPNLinkIndicator>true</MPNLinkIndicator>
        <MPNExpirationDate>2025-12-26</MPNExpirationDate>
      </Response>
    </Response>
  </Borrower>
  <Response>
    <ResponseCode>A</ResponseCode>
  </Response>
</Student>
</Response>
</AttendedSchool>
</Response>
</ReportingSchool>
</Response>
</DocumentTypeCode>PN</DocumentTypeCode>
</ProcessDate>2016-12-27</ProcessDate>
</Response>
</CommonRecord>
```
O*N05TG01005 ,CLS=CRPN22OP,XXX,BAT=0000000000000000000000002017-12-
018T22:29:51.0100000001,
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
<Source>
<COD>
<RoutingID>00000001</RoutingID>
</COD>
</Source>
<Destinations>
<School>
<RoutingID>10000028</RoutingID>
</School>
</Destinations>
<FinancialAwardNumber>001</FinancialAwardNumber>
<FinancialAwardID>999911741S22G00028001</FinancialAwardID>
<Response>
<ResponseCode>A</ResponseCode>
<EMPNIndicator>true</EMPNIndicator>
<MPNID>999911741M22G00027001</MPNID>
<MPNStatusCode>A</MPNStatusCode>
<MPNLinkIndicator>true</MPNLinkIndicator>
<MPNExpirationDate>2025-12-01</MPNExpirationDate>
</Response>
</DLSubsidized>
</Response>
</Student>
</Response>
</ReportingSchool>
</FinancialAwardData>
</TransmissonData>
</CommonRecord>
Direct PLUS Loan Credit Check

Credit checks for a Direct PLUS Loan are initiated in the following ways:

1) Submission of a PLUS award to the COD System

2) Borrower completion of a Direct PLUS Loan Request using the StudentAid.gov Web site

3) School initiated credit check using the COD Web site

The <CreditRequirementsMet> field is displayed on the following COD Web pages:

1. All Common Record, PLUS Application, Web, and Credit Status Response Information

2. Credit Check Information

3. Award Information

Business Rules

1. Credit Requirements Met must be ‘Yes’ (‘True’) before a school may disburse a Direct PLUS Loan.

2. If a credit check was performed on the applicant within 180 days of the date of the credit check trigger, COD does not perform a new credit check.

3. If a PLUS borrower’s credit decision is denied due to an adverse credit history, the borrower may obtain an endorser who does not have an adverse credit history or appeal the credit decision by documenting extenuating circumstances. The borrower will also be required to complete PLUS Credit Counseling.

4. When a school submits a PLUS origination and the borrower’s permanent address is outside the U.S. or U.S. territories, the COD
The system uses the borrower’s temporary address to conduct the credit check, if an address within the U.S. or U.S. territories is provided.

**Credit Decision Appeal Process**

PLUS loan applicants may appeal an adverse credit decision by documenting extenuating circumstances.

**Business Rules**

1. PLUS Applicants can initiate a credit appeal by:
   a. Calling the Student Loan Support Center
   b. Creating a credit appeal on StudentAid.gov

2. Credit decision appeals documentation may be submitted to the Student Loan Support Center in one of the following ways:
   a. Email documents (using password encryption for sensitive documents) to studentloansupport@ed.gov
   b. Fax documents to (877) 623-5082
   c. Mail documents to:
      
      US Department of Education
      Attn: Credit Appeals Team
      PO BOX 9002
      Niagara Falls, NY 14302
      
   d. Initiate a Chat session on the StudentAid.gov Web site and upload documents.

**Credit Status Response**

A Credit Status response will be sent under the following conditions:

1. When a borrower’s initial credit decision is pending and the credit decision changes to accepted or denied.

2. Credit Appeal status change when:
   a. A Credit Appeal is created for the declined credit decision.
   b. A Credit Appeal is placed in Pending Status (In Process, Awaiting Documentation, or Documentation in Review).
   c. A Credit Appeal is approved.
   d. A Credit Appeal is denied.
e. A Credit Appeal is closed.
f. A Credit Check is initiated via COD Web.

3. Endorser Addendum is processed and:
   a. Links to a declined PLUS award (Endorser Approved = ‘true’).
   b. Accepted for a PLUS Loan Request with a denied credit decision.
   c. Accepted for a PLUS Loan Request and also links to a PLUS Award linked to the same denied credit check.
   d. The endorser amount is less than the award amount.
      i. Edit 184 will also be returned. The school will not be allowed to disburse more than Endorsed Amount (Credit Action Status = ‘L’).
   e. The endorser’s credit decision is denied. The applicant may pursue a different endorser.

4. The PLUS Credit Counseling is completed and the applicant has a denied credit decision.

**Generating Credit Status Responses**

A new system generated Credit Status response will be sent to schools when a PLUS borrower with a declined credit status successfully obtains an approved endorser, has an appeal due to extenuating circumstances approved, and/or completes PLUS Credit Counseling.

**Business Rules**

If a PLUS borrower has a declined credit decision and wishes to receive a PLUS Loan, the borrower must obtain an approved endorser or successfully document extenuating circumstances, AND complete PLUS Credit Counseling.

1. A COD system generated Credit Status Response has a Document Type of ‘CS’.
2. A Document Type cs has a system-generated Document ID.
3. A Credit Status Response will be sent under the following conditions:
   a. Successful documentation of extenuating circumstances
   b. Receipt of an approved or denied endorser
c. Completion of PLUS Credit Counseling

4. A Credit Status Response contains the following data elements in the Response complex element <Response>:

a. Edit Process Result, <EditProcessResult> (only if Endorser Amount is less than Award Amount)

b. Endorser Amount, <EndorserAmount> (only if endorser exists on loan)

c. PLUS Original Credit Decision Status, <OriginalCreditDecisionStatus>
   i. A = Approved
   ii. D = Denied

d. PLUS Credit Appeal (extenuating circumstances) Status, <CreditAppealStatus>
   i. A = Approved
   ii. D = Denied
   iii. P = Pending
   iv. R = Closed

e. PLUS Credit Decision Date, <CreditDecisionDate>

f. PLUS Credit Decision Expiration Date, <CreditDecisionDate>

g. PLUS Credit Action Status, <CreditActionStatus>
   i. D = Endorser Denied. The applicant needs to obtain a different endorser.
   
   ii. N = The credit decision has changed from pending to denied or accepted.
   
   iii. L = Endorser Approved, but the endorser amount is less than the financial award amount.

h. PLUS Reconsideration Eligible Flag, <ReconsiderationEligible>

i. PLUS Credit Counseling Completed, <PLUSCounselingCompleted>

j. PLUS Credit Counseling Completion Date, <PLUSCounselingCompleteDate>

k. Credit Requirements Met, <CreditRequirementsMet>

l. Endorser Approved, <EndorserApproved>
5. The Endorser Amount, <EndorserAmount> is included in the Credit Status Response to indicate the endorsed amount on the Endorser Addendum.

   a. The Endorser Amount indicates the total amount of the PLUS loan for which the endorser has agreed to endorse.
   
   b. If the Endorser Amount is less than the Award Amount, the school will not be able to disburse more than the endorsed amount.

Example
Below is a sample Credit Status Response:

```
O*N05TG05506       ,CLS=CRCSYYOP,XXX,BAT=000000000000000000002017-02-09T16:49:52.9010005506,
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <CreatedDateTime>2016-07-09T23:23:45.49</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000270</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>F</FullResponseCode>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>10000270</RoutingID>
  </ReportingSchool>
  <AttendedSchool>
    <RoutingID>10000270</RoutingID>
    <Student>
      <Index>
        <SSN>011105794</SSN>
        <BirthDate>1968-01-03</BirthDate>
        <LastName>WIGGER</LastName>
      </Index>
      <Name>
        <FirstName>ALLIE</FirstName>
        <MiddleInitial>F</MiddleInitial>
      </Name>
      <DLPLUS>
        <FinancialAwardYear>2017</FinancialAwardYear>
        <ApplicationID>12905</ApplicationID>
        <Borrower>
          <Index>
            <SSN>011105794</SSN>
          </Index>
        </Borrower>
      </DLPLUS>
    </Student>
  </AttendedSchool>
</CommonRecord>
```
<BirthDate>1968-01-03</BirthDate>
<LastName>WIGGER</LastName>
</Index>

<Name>
 <FirstName>ALLIE</FirstName>
 <MiddleInitial>F</MiddleInitial>
</Name>
</Borrower>

<Response>
 <ResponseCode>A</ResponseCode>
</Response>
</DLPLUS>

<Student>
 <Index>
  <SSN>023651445</SSN>
  <BirthDate>1967-12-07</BirthDate>
  <LastName>JAMES</LastName>
 </Index>

<Name>
 <FirstName>THOMAS</FirstName>
 <MiddleInitial>P</MiddleInitial>
</Name>

<DLPLUS>
 <FinancialAwardYear>2017</FinancialAwardYear>
 <FinancialAwardNumber>1</FinancialAwardNumber>
 <FinancialAwardID>023651445P22G00270001</FinancialAwardID>
</DLPLUS>

<Borrower>
 <Index>
  <SSN>011185695</SSN>
  <BirthDate>1969-05-03</BirthDate>
  <LastName>SMITH</LastName>
 </Index>

<Name>
 <FirstName>JORDAN</FirstName>
 <MiddleInitial>K</MiddleInitial>
</Name>
</Borrower>

<Response>
 <ResponseCode>A</ResponseCode>
</Response>

<ErrorResponseCode>184</ErrorResponseCode>
<ResponseErrorCode>FinancialAwardAmount</ResponseErrorCode>
</EditProcessResult>

<EndorserAmount>5000.00</EndorserAmount>
<OriginalCreditDecisionStatus>D</OriginalCreditDecisionStatus>
<CreditAppealStatus>R</CreditAppealStatus>
**Direct PLUS Loan Award Processing with Endorser**

When an endorser is approved for a Direct PLUS Loan award, the COD System returns different information depending on a number of factors. The table below provides several general endorser scenarios and explains how they would be processed.

Beginning Spring 2015, Direct PLUS Loan borrowers who obtain an endorser must complete PLUS Credit Counseling on StudentAid.gov before a school may disburse on the loan. The Credit Status (CS) Response will contain a new `<CreditRequirementsMet>` tag with the value of “Y” when all credit requirements are met for disbursing a Direct PLUS Loan.

Endorser Addenda are included in the correspondence that the borrower receives at the time of the credit decision if denied. If no Direct PLUS Loan Request has been completed and no PLUS loan has been originated, the borrower cannot obtain an endorser addendum.
Important Note: In the scenarios on the next page, we assume the parent has completed a Direct PLUS Loan Request via the StudentAid.gov Web site. If a parent has not completed a Direct PLUS Loan Request via the StudentAid.gov Web site, the endorser can’t complete an Endorser Addendum until a Direct PLUS Loan award has been submitted to and processed by the COD System and the associated Award ID has been provided to the endorser.

<table>
<thead>
<tr>
<th>If the endorser completes the Endorser Addendum...</th>
<th>AND the endorsed amount is...</th>
<th>AND the Award...</th>
<th>THEN the school will receive...</th>
<th>To resolve, the school...</th>
</tr>
</thead>
<tbody>
<tr>
<td>Via StudentAid.gov Web site</td>
<td>Greater than or equal to the requested award amount</td>
<td>Isn’t on the COD System</td>
<td>A Credit Status (CS) response with:</td>
<td>Submits a Direct PLUS Loan to COD</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><code>&lt;EndorserApproved&gt;</code> = ‘True’ and the endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is on the COD System</td>
<td>A Credit Status (CS) response with: <code>&lt;EndorserApproved&gt;</code> = ‘True’ and the endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td>No further action necessary</td>
</tr>
<tr>
<td></td>
<td>Less than the requested award amount</td>
<td>Isn’t on the COD System</td>
<td>A CS response file: <code>&lt;EndorserApproved&gt;</code> = ‘True’, COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td>Originates the award</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is on the COD System</td>
<td>A CS response file with: <code>&lt;EndorserApproved&gt;</code> = ‘True’, COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td>Resubmits the award, using the same PLUS Loan ID, with the lower award amount (it must be less than or equal to the endorsed amount). <strong>A school may also submit via the COD Web</strong></td>
</tr>
<tr>
<td></td>
<td>Greater than or equal to the requested award amount</td>
<td>Isn’t on the COD System</td>
<td>A Credit Status (CS) response file with: <code>&lt;EndorserApproved&gt;</code> = ‘True’, COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td>Originates the award</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is on the COD System</td>
<td>A Credit Status (CS) response file with: <code>&lt;EndorserApproved&gt;</code> = ‘True’, COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td>No further action necessary</td>
</tr>
<tr>
<td></td>
<td>Less than the requested award amount</td>
<td>Isn’t on the COD System</td>
<td>A CS response file with: <code>&lt;EndorserApproved&gt;</code> = ‘True’, COD Warning Edit 184 and the lower endorsed amount</td>
<td>Originates the award</td>
</tr>
</tbody>
</table>

**Note:** It is best practice to determine PLUS loan eligibility and originate the PLUS loan at the time a PLUS Application (SP) response is received if the borrower indicated they intend to obtain an endorser or document extenuating circumstances.
**Subsidized Usage Limit Processing**

In June 2013, the COD System began identifying Direct Loan borrowers who are subject to the 150% Subsidy Usage Limit. In April 2014, the COD System required schools to submit new fields on all Direct Loan and TEACH Grants. The COD System will calculate the borrowers usage using the values submitted on the incoming record and the borrower’s loan information on the COD System. The COD System will return the calculated values to schools on the common record response.

A borrower’s Subsidized Usage fields will be viewable on the COD Web site. A school report will be available on the COD Reporting Web site.

Beginning in March 2015, COD began allowing school users to submit a Subsidized Usage Inquiry through the COD Web site when Direct Subsidized Usage issues arise that the school cannot resolve. The page will be accessible from the existing Direct Subsidized Loan Usage page. The inquiry will generate an email to FSA.

In addition, a Subsidized Usage Calculator is available on the COD Web site. Users are able to adjust award and disbursement data to estimate a borrower’s subsidized usage results. No changes were made to the borrower’s loans within the calculator will be saved to the COD system.

Reminder: It is important to report accurate and timely Direct Loan (subsidized, unsubsidized, and PLUS loan) information to the Common Origination and Disbursement (COD) System. It is equally important that schools update previously reported loan information as needed.

---

**Note:** Once the Direct PLUS Loan award is successfully processed, it will build on the COD System and link to the endorser information. The award response (COMRECO, CRAA, or CRDL) will also include COD Warning Edit 183, PLUS Award Accepted due to Valid Endorser Match.

<table>
<thead>
<tr>
<th>Is on the COD System</th>
<th>A CS response file with: <code>&lt;EndorserApproved&gt;</code> = ‘True’ COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag</th>
<th>Resubmits the award, using the same PLUS Loan ID, with the lower award amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>in the <code>&lt;EndorserAmount&gt;</code> tag</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Beginning in July 2021, the COD system will not apply the 150% Subsidized Usage limit for Direct Subsidized Loans with an Earliest Disbursement Date (EDD) on or after 07/01/2021.

**Setting the Subsidized Usage Limit Flag**

COD will continue to identify Direct Loan borrowers subject to the 150% Subsidized Usage limit for any existing Direct Subsidized Loans in the COD System with an Earliest Disbursement Date on or after July 1st 2013 and before July 1st 2021.

**Business Rules**

1. The COD system sets the SULA flag to Yes for a borrower if the following conditions are met:
   a. A record for the borrower containing a Direct Subsidized or Direct Unsubsidized Loan is submitted to the COD System
   b. The loan has an earliest disbursement date (EDD) on or after 7/1/2013 and before 7/1/2021
   c. The borrower has no outstanding balance on a Direct Loan or on a FFEL Program loan on July 1, 2013, or on the date the borrower obtains a Direct Loan after July 1, 2013.
   d. COD will continue to determine a loan’s eligibility for SULA if the EDD is on or after 7/1/2013 and before 7/1/2021.

2. When the borrower’s Subsidized Usage Limit Applies flag has been set to Yes, the date the flag was set displays on the COD Web site in the Subsidized Usage Limit Applies Date field.

**Subsidized Usage Limit Input Fields**

In March 2017, the input fields used to calculate a borrower’s subsidized usage were moved from the award level to the disbursement level. These tags are required at the disbursement level for all 2017-2018 loans and forward.

1. The following disbursement level tags are required on all Direct Loan records for 2017-2018 and forward.
   a. Program Credential Level `<ProgramCredentialLevel>`
      i. The valid values for Program Credential Level are:
• 1: Undergraduate certificate or diploma program
• 2: Associate’s degree
• 3: Bachelor’s degree
• 4: Post Baccalaureate certificate
• 5: Master’s degree
• 6: Doctoral degree
• 7: First Professional degree
• 8: Graduate/Professional certificate
• 99: Non-credential programs (preparatory coursework/teacher certification)

ii. The COD System will validate the Grade Level on the loan against the submitted Program Credential Level. The chart below outlines the valid Grade Level/Program Credential Level combinations. If an invalid combination is submitted, the COD System will reject the record with edit 208. Since the Program Credential Level is now at the disbursement level, if changes are made to the Student Level Code at the award level, corresponding changes to the Program Credential Level may be required for all disbursements associated with that award.

<table>
<thead>
<tr>
<th>Description</th>
<th>Program Credential Level</th>
<th>Student Level Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undergraduate certificate or diploma program</td>
<td>1</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Associate’s degree</td>
<td>2</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Bachelor’s degree</td>
<td>3</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Post Baccalaureate certificate</td>
<td>4</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Master’s degree</td>
<td>5</td>
<td>0-7 (Undergraduate &amp; Graduate)</td>
</tr>
<tr>
<td>Doctoral degree</td>
<td>6</td>
<td>0-7 (Undergraduate &amp; Graduate)</td>
</tr>
<tr>
<td>First Professional degree</td>
<td>7</td>
<td>0-7 (Undergraduate &amp; Graduate)</td>
</tr>
<tr>
<td>Graduate/Professional certificate</td>
<td>8</td>
<td>0-7 (Undergraduate &amp; Graduate)</td>
</tr>
<tr>
<td>Non-credential programs (preparatory coursework/teacher certification)</td>
<td>99</td>
<td>0-5 (Undergraduate)</td>
</tr>
</tbody>
</table>

iii. The <ProgramCredentialLevel> tag is optional when submitting changes to a disbursement.

b. Weeks Programs Academic Year
   <WeeksProgramsAcademicYear>
   i. The <WeeksProgramsAcademicYear> tag is only valid for the 2014-2015 Award Year and forward.
ii. The Weeks Programs Academic Year is the Title IV Academic Year and must be greater than or equal to 26. The COD system will reject the record with edit 209 if the Weeks Programs Academic Year is less than 26.

iii. `<WeeksProgramsAcademicYear>` must be submitted when `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` is submitted, or the `<SpecialPrograms>` is set to "Preparatory Coursework Graduate Professional Program."

iv. The `<WeeksProgramsAcademicYear>` tag will be ignored if submitted with the `<PublishedPgmLengthYears>` and will not be stored.

v. The `<WeeksProgramsAcademicYear>` tag is optional when submitting changes to a disbursement.

1. `<WeeksProgramsAcademicYear>` must be submitted when changing the Special Program to ‘Preparatory Coursework Graduate Professional Program’ or submitting `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` when `<PublishedPgmLengthYears>` was previously submitted for the disbursement.

c. Special Programs `<SpecialPrograms>`

i. If the tag is submitted it must include one of the following valid values for Special Programs are:

1. ‘A’ – Selective Admission Associated Program
2. ‘B’ – Bachelor’s Degree Completion Program
3. ‘N’ – Not Applicable
4. ‘P’ – Preparatory Coursework Graduate Professional Program
5. ‘T’ – Non-Credential Teacher Certification Program
6. ‘U’ – Preparatory Coursework Undergraduate Program

ii. The `<SpecialPrograms>` tag is only valid for the 2014-2015 Award Year and forward.

iii. The COD System will validate the `<SpecialPrograms>` tag value against the borrower’s Grade Level for that loan. The chart below outlines the valid Grade Level / Special Program combinations. If an invalid combination is submitted, the COD System will reject the record with edit 203. Since the Special Program tag is now at the disbursement level, if changes are made to the Student Level Code at the award level, corresponding changes to the Special Program tag may be required for all disbursements associated with that award.

iv.
### Special Program

<table>
<thead>
<tr>
<th>Special Program</th>
<th>Value</th>
<th>Valid Grade Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selective Admission Associated Program</td>
<td>A</td>
<td>0-5</td>
</tr>
<tr>
<td>Bachelor’s Degree Completion Program</td>
<td>B</td>
<td>0-5</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Preparatory Coursework Graduate Professional Program</td>
<td>P</td>
<td>5</td>
</tr>
<tr>
<td>Non-Credential Teacher Certification</td>
<td>T</td>
<td>5</td>
</tr>
<tr>
<td>Preparatory Coursework Undergraduate Program</td>
<td>U</td>
<td>1, 0</td>
</tr>
<tr>
<td>Tag Not Submitted</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

v. The `<SpecialPrograms>` tag is optional when submitting an origination or maintenance to a disbursement.

2. The COD System will require one of the following disbursement level tags on Direct Loan disbursements:

<table>
<thead>
<tr>
<th>Tag Not Submitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
</tr>
</tbody>
</table>

a. Published Program Length Years `<PublishedPgmLengthYears>`

b. Published Program Length Weeks `<PublishedPgmLengthWeeks>`

c. Published Program Length Months `<PublishedPgmLengthMonths>`

d. A school is only required to submit one of the 3 fields.

e. If Published Program Length Weeks or Published Program Length Months is submitted, the COD System will use that value to calculate the Published Program Length Years. That calculated value will be returned in the `<CalculatedPublishedPgmLengthYears>` tag on the common record response.

f. If none of the three tags are submitted, the COD System will reject the loan with edit 996.

g. If more than one of the three tags is submitted, the COD System will reject the loan with edit 202.

h. If Special Programs is equal to Preparatory Coursework Graduate Professional Program on a Direct Loan origination, a school is not required to submit a Published Program Length tag. If a Published Program Length tag is submitted and Special Programs is equal to ‘Prep Grad’, the values will be ignored and will not be stored on the system.

i. Note: if a school submits a change to the Special Programs tag to a value other than ‘Prep Grad’, the record must contain one of the Published Program Length tags.

---

Schools may submit a new Published Program Length tag without nilling out the previously reported. The COD System will use the most recently submitted Published Program Length tag to determine the `<CalculatedPublishedPgmLengthYears>` tag.
i. The Published Program Length tags are optional on when changes are made to an award.

3. The COD system will require the following tags on Direct Loans disbursements:
   a. <EnrollmentStatus>
      i. <EnrollmentStatus> must equal the enrollment status of the student at the time of disbursement.
      ii. The valid values for <EnrollmentStatus> are:
          1. ‘F’ - Full Time = 1.00
          2. ‘Q’ - Three-quarters Time = 0.75
          3. ‘H’ - Half Time = 0.50
          4. ‘L’ - Less than half time (note: ‘L’ is not valid for Direct Loan disbursements)
      iii. The COD System will reject a disbursement with edit 996 if a value of ‘L’ is submitted in the <EnrollmentStatus> field
      iv. <EnrollmentStatus> is optional when submitting changes to disbursements and should only be resubmitted if the original submission was incorrect.
      v. In order to change the tag on a funded disbursement, the disbursement sequence number must be incremented.
   b. <ProgramCIPCode>
      i. The valid CIP codes can be found at the following location: http://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55
      ii. The COD System will reject an invalid CIP Code with edit 204.
      iii. The COD System will confirm that the Loan Period Begin date is on or after the CIP Code effective date. If the Loan Period Begin Date is before the CIP Code effect date, the COD System will reject the record with edit 204.
      iv. A valid <ProgramCIPCode> must be submitted with a disbursement upon origination.
      v. <ProgramCIPCode> is optional when submitting maintenance to a disbursement and should only be resubmitted if the original submission was incorrect.
   c. <ProgramCIPCodeYear>
      i. The COD System will reject an invalid CIP Code Year with edit 204.
      ii. A valid <ProgramCIPCodeYear> must be submitted with a disbursement upon origination.
      iii. <ProgramCIPCodeYear> is optional when submitting maintenance to a disbursement and should only be resubmitted if the original submission was incorrect.
In order to change the tag on an actual disbursement, the disbursement sequence number must be incremented. Any changes to an accepted actual disbursement must also include an increase to the disbursement sequence number.

d. `<PaymentPeriodStartDate>`
   i. The Payment Period Start Date must be greater than or equal to the Financial Award Begin Date. If the Payment Period Start Date is not greater than or equal to the Financial Award Begin Date, the COD System will reject the disbursement with edit 205. COD will bypass edit 205 if the disbursement amount is zero.

   ii. Subsequent payment period start date (s) would be equal to the begin date of the subsequent term (s).

For example, for schools that submit one disbursement per term/payment period, Financial award (loan period) begin date is November 3, 2016 and payment period start date associated with disbursement 1 would be November 3, 2016. The next term (semester, quarter, second half of the clock hours) begins March 2, 2017 so the next payment period start date associated with the second disbursement would be March 2, 2017.

   iii. `<PaymentPeriodStartDate>` is optional when submitting changes to a disbursement.

   In order to change the tag on a funded disbursement, the disbursement sequence number must be incremented.
Subsidized Usage Limit Calculations and Non-Credential Teacher Certification Subsidized Usage

When the loan’s award amount is reduced to below the loan limit, the COD System will recalculate the borrower’s Subsidized Usage by dividing loan period length by academic year length and prorate the usage based upon enrollment status. Beginning in April 2014, the COD System began using the required school submitted tags to calculate a borrower’s Subsidized Usage. The borrower’s calculated Subsidized Usage fields will be returned on the common record response and viewable on the COD Web site if the EDD is on or after 7/1/2013 and before 7/1/2021.

There are two categories of subsidized usage:

- Undergraduate Subsidized Usage which includes loans received while enrolled in undergraduate programs excluding non-credential teacher certification programs.

  The COD System will determine the subsidized usage category based upon the value submitted in the `<SpecialPrograms>` tag in the incoming record. If a value other than ‘T’ (Non-Credential Teacher Certification) is submitted, the COD System will categorize the usage calculated as undergraduate subsidized usage. The subsidized usage calculations will exclude loans that have a value of ‘T’ in the `<SpecialPrograms>` field.

- Non-Credential Teacher Certification Usage which includes loans received while enrolled in non-credential certification programs only.

  The COD System will determine the subsidized usage category based upon the value submitted in the `<SpecialPrograms>` tag in the incoming record. If the value of ‘T’ (Non-Credential Teacher Certification) is submitted, the COD System will categorize the usage calculated as non-credential teacher certification subsidized usage. The non-credentialed teacher certification subsidize usage calculations will exclude loans which do not have a value of ‘T’ in the `<SpecialPrograms>` field. See the ‘Non-Credential Teacher Certification Program Processing’ section for more information.

Note: For all 2017-2018 awards, the Special Programs tag moved to the disbursement block. This may result in disbursements for a single Direct Loan award to have different Special Programs values. The COD System will determine whether Undergraduate Subsidized usage or Non-Credential Teacher Certification usage is calculated based off other relevant disbursement data; the usage for that award will continue to only apply to one subsidized usage category.

If a Direct Subsidized Loan has only anticipated disbursements (all disbursements have a disbursement release indicator of `false`), COD will include the loan only in calculations for that loan and return anticipated subsidized usage calculation values for that loan.
If a Direct Subsidized Loan has at least one actual disbursement (at least one disbursement has a disbursement release indicator of true), COD will include that loan in all subsidized usage calculations for that borrower and return actual subsidized usage calculation values for that loan.

### Subsidized Usage Calculation Business Rules

1. The COD System will calculate Non-Credential Teacher Certification Subsidized Usage values for Direct Subsidized Loans with a value ‘T’ in the `<SpecialPrograms>` field.

2. The COD System will calculate Undergraduate Subsidized Usage values for Direct Subsidize Loans that don’t have a value of ‘T’ in the `<SpecialPrograms>` field.

3. A borrower may have both Undergraduate Subsidized Usage values and Non-Credential Teacher Certification values. If a Direct Loan has disbursements with different values in the `<SpecialPrograms>` field, COD will determine which subsidized usage category to use.

4. The COD System will return different tags in the common response for borrowers enrolled in a Non-Credentialed Teacher Certification Program.

5. The COD System will calculate and return in the common record response the following person-level Subsidized Usage values:

<table>
<thead>
<tr>
<th>Undergraduate Tags</th>
<th>Non-Credential Teacher Certification Tags</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. <code>&lt;SubsidizedUsageLimitApplies&gt;</code> (Shared)</td>
<td></td>
</tr>
<tr>
<td>i. Reference the ‘Setting the Subsidized Usage Limit Flag’ section for more information on how COD will calculate this field.</td>
<td></td>
</tr>
<tr>
<td>ii. The Subsidized Usage Limit Applies field will be returned at the person level on the common record response file.</td>
<td></td>
</tr>
<tr>
<td>b. <code>&lt;SumActualSubUsagePeriods&gt;</code></td>
<td>b. <code>&lt;SumNonCredTeachCertActualSubUsagePeriods&gt;</code></td>
</tr>
<tr>
<td>i. The <code>&lt;SumActualSubUsagePeriods&gt;</code> is the total of all <code>&lt;ActualSubUsagePeriods&gt;</code> for the student.</td>
<td>i. The <code>&lt;SumActualSubUsagePeriods&gt;</code> is the total of all actual Subsidized Usage periods for the student.</td>
</tr>
<tr>
<td>ii. The <code>&lt;SumActualSubUsagePeriod&gt;</code> will be returned on the common record response at the person level.</td>
<td>ii. The <code>&lt;SumActualSubUsagePeriod&gt;</code> will be returned on the common record response at the person level for applicable borrowers.</td>
</tr>
</tbody>
</table>

6. The COD System will calculate and return the following award-level Subsidized Usage tags and values in the common record response:

<table>
<thead>
<tr>
<th>Undergraduate Tags</th>
<th>Non-Credential Teacher Certification Tags</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. <code>&lt;CalculatedPublishedPgmLengthYears&gt;</code></td>
<td>b. <code>&lt;CalculatedPublishedPgmLengthYears&gt;</code></td>
</tr>
</tbody>
</table>

Special Programs

The Special Programs tag has been moved to the disbursement level for Direct Loans for the 2017-2018 Award year and forward.
i. The COD System will calculate the `<CalculatedPublishedPgmLengthYears>` using the values submitted for `<PublishedPgmLengthWeeks>` or `<PublishedPgmLengthMonths>`, and `<WeeksProgramsAcademicYear>`. 

ii. If `<PublishedPgmLengthYears>` is submitted, that value will be returned in `<CalculatedPublishedPgmLengthYears>`. 

iii. The `<CalculatedPublishedPgmLengthYears>` value is used to determine the `<MaxSubEligibilityPeriod>`, and `<RemainingSubEligibilityPeriod>` for that loan. 

iv. The COD System will recalculate the value if any of the incoming `Published Program Length` values change or `<WeeksProgramsAcademicYear>` changes. 

<table>
<thead>
<tr>
<th>Undergraduate Tags</th>
<th>Non-Credential Teacher Certification Tags</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>a. <code>&lt;MaxSubEligibilityPeriod&gt;</code> (Shared Tag)</strong></td>
<td><strong>b. <code>&lt;MaxSubEligibilityPeriod&gt;</code> (Shared Tag)</strong></td>
</tr>
<tr>
<td>i. <code>&lt;MaxSubEligibilityPeriod&gt;</code> is the maximum period of time in which a student may receive a subsidized loan based on the published program length reported for the loan. It is equal to 150% of the calculated published program length in academic years.</td>
<td>i. <code>&lt;MaxSubEligibilityPeriod&gt;</code> is the maximum period of time in which a student may receive a subsidized loan based on the published program length reported for the loan. It is equal to 150% of the calculated published program length in academic years.</td>
</tr>
<tr>
<td>ii. The COD System will recalculate the value when any of the incoming Published Program Length values change.</td>
<td>ii. The COD System will recalculate the value when any of the incoming Published Program Length values change.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>c. <code>&lt;AcademicYearLength&gt;</code></strong></th>
<th><strong>d. <code>&lt;AcademicYearLength&gt;</code></strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>i. The <code>&lt;AcademicYearLength&gt;</code> is the length of the student's Academic Year at the school.</td>
<td>i. The <code>&lt;AcademicYearLength&gt;</code> is the length of the student's Academic Year at the school.</td>
</tr>
<tr>
<td>ii. The field is calculated using the Academic Year Begin and End dates submitted on the award.</td>
<td>ii. The field is calculated using the Academic Year Begin and End dates submitted on the award.</td>
</tr>
<tr>
<td>iii. The COD System will recalculate the field if the Academic Year Begin or End dates change.</td>
<td>iii. The COD System will recalculate the field if the Academic Year Begin or End dates change.</td>
</tr>
</tbody>
</table>
### Undergraduate Tags

<table>
<thead>
<tr>
<th>Tag</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><code>&lt;ActualSubUsagePeriod&gt;</code></td>
<td>i. <code>&lt;ActualSubUsagePeriod&gt;</code> is the period of time used by the student related to the reported loan.</td>
</tr>
<tr>
<td></td>
<td>ii. <code>&lt;ActualSubUsagePeriod&gt;</code> is returned when the loan has at least one actual disbursement (DRI = true).</td>
</tr>
<tr>
<td></td>
<td>iii. <code>&lt;ActualSubUsagePeriod&gt;</code> is calculated using loan period length, academic year length and enrollment status.</td>
</tr>
</tbody>
</table>

### Non-Credential Teacher Certification Tags

<table>
<thead>
<tr>
<th>Tag</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><code>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</code></td>
<td>i. <code>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</code> is the period of time used by the student related to the reported loan.</td>
</tr>
<tr>
<td></td>
<td>ii. <code>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</code> is returned when the loan has at least one actual disbursement (DRI = true).</td>
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<td>iii. <code>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</code> is calculated using loan period length, academic year length and enrollment status.</td>
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<tr>
<td><code>&lt;AnticipatedSubUsagePeriod&gt;</code></td>
<td>i. <code>&lt;AnticipatedSubUsagePeriod&gt;</code> is the period of time used by the student related to the reported loan.</td>
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<td></td>
<td>ii. <strong>&lt;ActualSubUsagePeriod&gt;</strong> is returned when the loan has at least one actual disbursement (DRI=true).</td>
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<tr>
<td></td>
<td>iii. <strong>&lt;ActualSubUsagePeriod&gt;</strong> is calculated using loan period length, academic year length and enrollment status.</td>
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### Non-Credential Teacher Certification Tags

<table>
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<th>Description</th>
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<tbody>
<tr>
<td><strong>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</strong></td>
<td>i. <strong>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</strong> is the period of time used by the student related to the reported loan.</td>
</tr>
<tr>
<td></td>
<td>ii. <strong>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</strong> is returned when the loan has at least one actual disbursement (DRI=true).</td>
</tr>
<tr>
<td></td>
<td>iii. <strong>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</strong> is calculated using loan period length, academic year length and enrollment status.</td>
</tr>
</tbody>
</table>

### Anticipated SubUsage Periods

<table>
<thead>
<tr>
<th>Tag</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>&lt;AnticipatedSubUsagePeriod&gt;</strong></td>
<td>i. <strong>&lt;AnticipatedSubUsagePeriod&gt;</strong> is the period of time used by the student related to the reported loan.</td>
</tr>
<tr>
<td></td>
<td>ii. <strong>&lt;AnticipatedSubUsagePeriod&gt;</strong> is returned only when the reported loan has only anticipated disbursements (DRI=false).</td>
</tr>
<tr>
<td></td>
<td>iii. <strong>&lt;AnticipatedSubUsagePeriod&gt;</strong> is returned only when all disbursements for the reported loan are anticipated (DRI=false).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tag</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt;</strong></td>
<td>i. <strong>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt;</strong> is the period of time used by the student related to the reported loan.</td>
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<td></td>
<td>ii. <strong>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt;</strong> is returned only when the reported loan has only anticipated disbursements (DRI=false).</td>
</tr>
<tr>
<td></td>
<td>iii. <strong>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt;</strong> is returned only when all disbursements for the reported loan are anticipated (DRI=false).</td>
</tr>
</tbody>
</table>
### Subsidized Usage Limit Processing

#### iii. The `<AnticipatedSubUsagePeriod>` is calculated using the Loan Period Length, Academic Year Length, and the Enrollment Status.

#### `<SumActualSubUsagePeriods>`<br>

**i.** `<SumActualSubUsagePeriods>` is the sum of all actual Subsidized Usage periods for the student for the reported loan.

**ii.** `<SumActualSubUsagePeriods>` is returned only when at least one actual disbursement (DRI=true) for the reported loan.

#### `<SumAnticipatedSubUsagePeriods>`<br>

**i.** `<SumAnticipatedSubUsagePeriods>` is the sum of all actual Subsidized Usage periods for the student, plus the Subsidized Usage period for the reported loan.

**ii.** `<SumAnticipatedSubUsagePeriods>` is returned only when all disbursements for the reported loan are anticipated (DRI=false).

#### `<SumActualNonCredTeacherCertSubUsagePeriods>`<br>

**i.** `<SumActualNonCredTeacherCertSubUsagePeriods>` is the sum of all actual Non Credential Teacher Certification Subsidized Usage periods for the student for the reported loan.

**ii.** `<SumActualNonCredTeacherCertSubUsagePeriods>` is returned only when at least one actual disbursement (DRI=true) for the reported loan.

#### `<SumAnticipatedNonCredTeacherCertSubUsagePeriods>`<br>

**i.** `<SumAnticipatedNonCredTeacherCertSubUsagePeriods>` is the sum of all actual Subsidized Usage periods for the student, plus the Subsidized Usage period for the reported loan.

**ii.** `<SumAnticipatedNonCredTeacherCertSubUsagePeriods>` is returned only when all disbursements for the reported loan are anticipated (DRI=false).
<table>
<thead>
<tr>
<th>Undergraduate Tags</th>
<th>Non-Credential Teacher Certification Tags</th>
</tr>
</thead>
<tbody>
<tr>
<td><code>&lt;RemainingActualSubEligibilityPeriod&gt;</code></td>
<td><code>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt;</code></td>
</tr>
<tr>
<td>i. <code>&lt;RemainingActualSubEligibilityPeriod&gt;</code> is the remaining period of time in which the student may receive a Direct Subsidized Loan.</td>
<td>i. <code>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt;</code> is the remaining period of time in which the student may receive a Direct Subsidized Loan.</td>
</tr>
<tr>
<td>ii. <code>&lt;RemainingActualSubEligibilityPeriod&gt;</code> is returned only when there is at least one actual disbursement (DRI=true) for the reported loan</td>
<td>ii. <code>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt;</code> is returned only when there is at least one actual disbursement (DRI=true) for the reported loan</td>
</tr>
<tr>
<td>iii. <code>&lt;RemainingActualSubEligibilityPeriod&gt;</code> is equal to the <code>&lt;MaxSubEligibilityPeriod&gt;</code> minus the <code>&lt;SumActualSubUsagePeriods&gt;</code></td>
<td>iii. <code>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt;</code> is equal to the <code>&lt;MaxSubEligibilityPeriod&gt;</code> minus the <code>&lt;SumActualSubUsagePeriods&gt;</code></td>
</tr>
<tr>
<td><code>&lt;RemainingAnticipatedSubEligibilityPeriod&gt;</code></td>
<td><code>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt;</code></td>
</tr>
<tr>
<td>i. <code>&lt;RemainingAnticipatedSubEligibilityPeriod&gt;</code> is the remaining period of time in which the student may receive a Direct Subsidized Loan.</td>
<td>i. <code>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt;</code> is the remaining period of time in which the student may receive a Direct Subsidized Loan.</td>
</tr>
<tr>
<td>ii. <code>&lt;RemainingAnticipatedSubEligibilityPeriod&gt;</code> is returned only when all disbursements for the reported loan are anticipated (DRI=false)</td>
<td>ii. <code>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt;</code> is returned only when all disbursements for the reported loan are anticipated (DRI=false)</td>
</tr>
<tr>
<td>iii. <code>&lt;RemainingAnticipatedSubEligibilityPeriod&gt;</code> is equal to the <code>&lt;MaxSubEligibilityPeriod&gt;</code> minus the <code>&lt;SumAnticipatedSubUsagePeriods&gt;</code></td>
<td>iii. <code>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt;</code> is equal to the <code>&lt;MaxSubEligibilityPeriod&gt;</code> minus the <code>&lt;SumAnticipatedSubUsagePeriods&gt;</code></td>
</tr>
</tbody>
</table>

**Note:** Beginning in October 2016, COD will bypass existing edit 206 for origination or maintenance records that cause the loan’s Remaining Subsidized Eligibility Period to increase or stay the same.

**Reporting Non-Credential Teacher Certification Programs for Prior Award Years**

For instructions on how to submit the Non-Credential Teacher Certification Program for prior years, please reference the 2014-2015 Technical Reference.
**Subsidized Usage Calculation Change System Generated Response**

The Subsidized Usage System Generated Response (CRSUYYOP) allows a school to update their system with the most accurate Subsidized Usage information for the loan.

A borrower’s Subsidized Usage Period and Remaining Subsidized Eligibility Period are calculated using the value returned in the `<LoanPeriodLength>` tag, which is also calculated by the COD System.

Recalculation of the Loan Period Length (and subsequent downstream COD calculations) is not limited to activity submitted by the school. The Loan Period Length on a loan may change as a result of updates submitted by another school on an overlapping loan. This may also apply to two loans at a single school, if they have overlapping Financial Award Begin and End Dates. Additionally, a loan’s Loan Period Length may also be recalculated for the following reasons:

- Zeroing out an award amount
- Increasing an award amount from zero
- Increasing an award amount to the loan limit (see Loan Limit Exception information box above)
- Decreasing an award amount from the loan limit (see Loan Limit Exception information box above)
- Changing award from anticipated to actual
- Loan Discharge
- Loan paid in full within 120 days

The COD System will send a Subsidized Usage Unsolicited System Generated Response to schools in situations where activity has caused a loan’s calculated Subsidized Usage values to change, and that school did not receive the latest information in their last common record response file. The Subsidized Usage system generated response is to be used by the schools to update Subsidized Usage in their system. Students with remaining Subsidized Usage less than or equal to zero have reached their maximum subsidized eligibility limit based on the program length reported for that loan.

**Business Rules**

1. The Subsidized Usage System Generated Response is sent to a school’s TG mailbox daily.

2. A COD system-generated Subsidized Usage response contains a Document Type of SU. The Document Type indicates the type of Response.

3. The Subsidized Usage System Generated Response contains a system-generated Document ID.

4. The Subsidized Usage System Generated Response may contain the following data elements in the Response Complex Element:
   a. Calculated Published Program LengthYears
   b. Anticipated Subsidized Usage Period
c. Actual Subsidized Usage Period

d. Academic Year Length

e. Loan Period Length

f. Maximum Subsidized Eligibility Period

g. Remaining Actual Subsidized Eligibility Period

h. Remaining Anticipated Subsidized Eligibility Period

i. Sum Anticipated Subsidized Usage Periods

j. Anticipated Non-Credential Teacher Certification Program Subsidized Usage Period

k. Actual Non-Credential Teacher Certification Program Subsidized Usage Period

l. Remaining Actual Non-Credential Teacher Certification Program Subsidized Eligibility Period

m. Remaining Anticipated Non-Credential Teacher Certification Program Subsidized Eligibility Period

n. Sum Anticipated Non-Credential Teacher Certification Program Subsidized Usage Periods

o. Subsidized Usage Limit Applies

p. Sum Actual Subsidized Usage Periods

q. Sum Actual Non-Credential Teacher Certification Subsidized Usage Periods

5. The Subsidized Usage System Generated Response will be sent for prior award years. This will allow schools to import calculated Subsidized Usage values for prior award years.

6. The message class for the Subsidized Usage System Generated Response is CRSUYYOP, where YY is equal to the award year. Below is a chart listing the valid message classes by award year:

<table>
<thead>
<tr>
<th>Award Year</th>
<th>Message Class</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021-2022</td>
<td>CRSU22OP</td>
</tr>
<tr>
<td>2020-2021</td>
<td>CRSU21OP</td>
</tr>
<tr>
<td>2019-2020</td>
<td>CRSU20OP</td>
</tr>
<tr>
<td>2018-2019</td>
<td>CRSU19OP</td>
</tr>
<tr>
<td>2017-2018</td>
<td>CRSU18OP</td>
</tr>
<tr>
<td>2016-2017</td>
<td>CRSU17OP</td>
</tr>
<tr>
<td>2015-2016</td>
<td>CRSU16OP</td>
</tr>
<tr>
<td>2014-2015</td>
<td>CRSU15OP</td>
</tr>
</tbody>
</table>

7. Schools do not have the option to opt-out of receiving the Subsidized Usage System Generated Responses.
8. Schools may request a borrower’s most recent Subsidized Usage via System Generated Responses via the COD Web site.

   a. A COD Web user may request a borrower’s Subsidized Usage information using the Subsidized Usage Request page under the ‘Batch’ tab of the COD Web site.

   b. Users must search by borrower SSN and associated Entity ID in order to request the most recent Subsidized Usage information for that borrower.

**Example**

Below is a Subsidized Usage System Generated Response:

```xml
<?xml version="1.0" encoding="UTF-8"?>
  <TransmissionData>
    <DocumentID>2017-01-29T14:04:02.1000000001</DocumentID>
    <CreatedDateTime>2017-01-29T14:05:06.19</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
      <Destination>
        <School>
          <RoutingID>10004949</RoutingID>
        </School>
      </Destination>
      <FullResponseCode>F</FullResponseCode>
    </TransmiissionData>
    <ReportingSchool>
      <RoutingID>10004949</RoutingID>
    </ReportingSchool>
    <AttendedSchool>
      <RoutingID>10004949</RoutingID>
    </AttendedSchool>
    <Student>
      <Index>
        <SSN>001070711</SSN>
        <BirthDate>1967-08-20</BirthDate>
        <LastName>HEIERMANN</LastName>
      </Index>
      <DLSubsidized>
        <FinancialAwardYear>2022</FinancialAwardYear>
        <FinancialAwardNumber>1</FinancialAwardNumber>
        <FinancialAwardID>001070711S22G04949001</FinancialAwardID>
      </DLSubsidized>
      <Response>
        <ResponseCode>A</ResponseCode>
        <CalculatedPublishedPgmLengthYears>4.000</CalculatedPublishedPgmLengthYears>
        <AnticipatedSubUsagePeriod>0.0</AnticipatedSubUsagePeriod>
        <ActualSubUsagePeriod>1.0</ActualSubUsagePeriod>
        <AcademicYearLength>31</AcademicYearLength>
        <LoanPeriodLength>31.000</LoanPeriodLength>
        <MaxSubEligibilityPeriod>6.0</MaxSubEligibilityPeriod>
        <RemainingActualSubEligibilityPeriod>4.4</RemainingActualSubEligibilityPeriod>
      </Response>
    </Student>
  </CommonRecord>
```

Required Updates/Loan Reductions

In Dear Colleague Letter Gen-13-13, schools are required to reduce remaining anticipated disbursements to zero, adjust all award amounts to equal the sum of actual disbursements, and adjust loan period dates to remove terms/payment periods for which no disbursement was made or retained. These changes are to be made within the 15-day reporting guidelines. For more detailed guidance see the Electronic Announcement 150% Direct Subsidized Loan Limit: Electronic Announcement #21 - Common Subsidized Loan Limit Usage Inquiries.

Beginning late 2017, in cases where the school has not made the required updates, the COD system will update the records when:

1. The school or FSA confirms the school has closed out for the award year for which the loan was reported.
   And/Or
2. The closeout date has passed, the school is not on extended processing and the latest loan period (i.e. the financial award end
date) for that school is in the past. The date of the reduction will be announced.

The COD system will reduce remaining anticipated disbursements to zero, adjust all award amounts to equal the sum of actual disbursements, adjust loan period dates so that all zero dollar disbursements are outside the loan period, and recalculate subsidized usage for each borrower.

When the reductions occur, the school will receive Subsidized Usage Change Responses (CRSUXXOP) for the loans impacted with the updated subsidized usage values. The school will not receive a Common Record response for these changes because the award year has been closed out.

A new SULA Adjustments Needed Report will be provided during the program year closeout timeframe which will list the loans that appear to need adjustment. See the Volume 6, Section 8 for details.

The system generated loan reductions in no way relieves schools of their obligation to accurately report and update loan data per FSA Handbook guidance.

---

**Direct Loan Closeout**

The COD System provides the ability for schools to perform end of program year closeout activities for Award Year 2011-2012 and forward.

The Direct Loan established data submission deadline for the 2021-2022 Program Year is July 31, 2023. This is the last processing day of the program year, so all school data must be received and accepted by this date in order to be included in a school's final Ending Cash Balance for the year.

As a reminder, all cash management, disbursement reporting, and monthly reconciliation regulatory requirements supersede the data submission deadline. If a school is meeting these regulatory requirements, the final closeout stage should begin no later than the last award end date at the school for a given program and year. In other words, a school should be able to reconcile to a zero Ending Cash Balance and close out soon after its final disbursements and should not wait until the data submission deadline.

Note: Exceptions to the last processing day of the program year may be made on a case-by-case basis, if the school’s processing period extends beyond the data submission deadline. Schools falling within this category must request extended processing via the COD Web site.

**Business Rules**
1. When a school’s internal ending cash balance and unbooked loans are $0, it is in agreement with the ending cash balance reflected in the school’s most recent Direct Loan School Account Statement (SAS) for the award year, and the school has no outstanding issues for this program year, the school should complete the Program Year Closeout Balance Confirmation Form in COD Web. Once the school has successfully confirmed closeout the following actions with occur:

   a. The Department will send a Program Year Closeout letter to the school’s President and Financial Aid Director.
   b. COD will reject award or disbursement changes per published edits.
   c. The Department will reduce the school's Current Funding Level (CFL) to the greater of Net Drawdowns or Net Accepted & Posted Disbursements.
   d. The Department will reduce remaining anticipated disbursements to zero, adjust all award amounts to equal the sum of actual disbursements, adjust loan period dates so that all zero dollar disbursements are outside the loan period, and recalculate subsidized usage for each borrower.
   e. The SAS and other reports for this award year and program will no longer be sent.

**NOTE:** If the school should need to submit data for this award year at a future time they can request to be reopened or placed on extended processing via the Request Reopen/Extended Processing page in COD.

2. COD will send the following closeout correspondence:

   a. **Notification Warning Letter:** Sent to schools as a reminder to finish processing and confirm closeout before the established data submission deadline.

   b. **Remaining Balance Letter:** Informs the school that they have a remaining balance that needs to be reconciled before they can close out the award year. The letter notifies the school of the number of days they are past the Latest Award End Date.

   c. **Zero Balance Letter:** Informs the school that they have a $0 Ending Cash Balance in COD. It instructs the school to use the Balance Confirmation page on the COD Web site to confirm closeout if the school agrees with the balance information and is fully reconciled.
**Note:** Starting in June 2017 schools will no longer need to wait for a Direct Loan Zero Balance letter to use the Balance Confirmation page in COD. However, schools should wait for a School Account Statement with a $0.00 Ending Cash Balance to do a final reconciliation prior to officially closing out the award year.

d. **Program Year Closeout Letter:** Sent to schools once they have completed the Balance Confirmation process and are considered closed out for the requested program and award year. This includes completing the Balance Confirmation Page in COD Web and verifying their ending cash balance and unbooked loans balances haven’t changed.

e. **Reopen Change Letter:** Sent to schools to notify them that they are no longer considered confirmed closed out for the award year because:
   i. The school’s balances in the Common Origination and Disbursement (COD) System have changed and/or
   ii. Staff at school has requested to be reopened to continue processing via the Request Reopen/Extended Processing page on the COD Web site.

f. **Extended Processing Letter:** Sent to schools that have been approved for an extension to the data submission deadline. Notifies the school of the expiration date of that extension.

**NOTE:** Schools can find a HTML copy of the above correspondence on the School Correspondence page via the COD Web site.

---

**StudentAid.gov Web site**

The StudentAid.gov Web site offers the following functionality for Direct Loan borrowers and TEACH Grant recipients:

- Annual Student Loan Acknowledgement
- Electronic Master Promissory Note (eMPN)
- Entrance Counseling
- Financial Awareness Counseling
- Exit Counseling
- PLUS Credit Counseling
- Direct PLUS Loan Requests
- Endorser Addendum
• Electronic Correspondence
• Electronic application for Income Driven Repayment plans
• Loan Consolidation
• Deferment, forbearance and repayment plan forms (downloadable)
• TEACH Grant Agreement to Serve or Repay
• TEACH Grant Initial and Subsequent Counseling
• TEACH Grant Exit Counseling
• TEACH Grant Conversion Counseling

**Electronic Master Promissory Note**

Direct Subsidized/Direct Unsubsidized, and Direct PLUS for Graduate/Professional students and Parent borrowers may complete and submit an electronic Master Promissory Note using the StudentAid.gov Web site.

**Direct Loan Entrance Counseling**

In February 2021, Direct Loan Entrance Counseling on StudentAid.gov was redesigned to include short modules of streamlined content and integration with College Scorecard. The entrance counseling meets regulatory requirements and a demo version is viewable outside login. Schools have the option to receive “Daily” or “On-demand” responses when a student completes entrance counseling on StudentAid.gov. School users are able to search for and view Entrance Counseling completion information and counseling responses on the COD Web site.

There are two types of Direct Loan Entrance Counseling available for search on the Direct Loan Counseling search page:

- Direct Sub/Unsub Entrance Counseling – Signifies that the student has completed Sub/Unsub Entrance Counseling.

- Direct Sub/Unsub/PLUS Entrance Counseling – Signifies that the student has completed Sub/Unsub and PLUS Loan Entrance Counseling.

**Business Rules for Direct Loan Entrance Counseling**

1. Completion of Direct Loan Entrance Counseling in StudentAid.gov is optional and not required for a student to complete an MPN or PLUS Loan Request.

2. Direct Loan Entrance Counseling will be solely associated with the student and not with any individual Direct Loan award or MPN.

3. A student must complete the entire Counseling session and submit for the session to be considered complete. Incomplete Counseling sessions will not be saved.

4. Entrance Counseling satisfies the regulatory requirements for completing Entrance Counseling.

5. The following school options are available on the School Options page on the COD Web site and can be updated at any time:
a. Electronic Entrance Counseling Participant
   i. Y indicates the school participates in electronic entrance counseling.
   ii. N indicates the school does not participate in electronic entrance counseling.

b. Entrance Counseling Response Frequency
   i. On-Demand
   ii. Daily

6. New schools are defaulted to ‘Daily for the ‘Entrance Counseling Response Frequency’ option.

7. Entrance counseling completion information will be retrievable by authorized users on the existing Counseling Search page under the Person tab.

   a. If a school chooses not to receive Entrance Counseling responses, completion information will be available via the counseling search page.

   b. School users will be able to download the counseling search results as a .csv file after the search results are returned.

8. If a StudentAid.gov user selects a school to notify of entrance counseling completion, the completion information is included in the Counseling Report regardless of the frequency to receive responses the school selected.

Example
Below is a sample Entrance Counseling Acknowledgement:

```
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <CreatedDateTime>2017-03-28T17:06:12.95</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000111</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>F</FullResponseCode>
  </TransmissionData>
```
Financial Awareness Counseling

StudentAid.gov users may complete Financial Awareness Counseling. The Financial Awareness Counseling Tool on the StudentAid.gov website will provide users with relevant tools and financial information to understand their financial aid and manage their finances. Schools who choose to receive Financial Awareness Counseling responses will receive responses from COD when borrowers complete Financial Awareness Counseling. School users will also be able to search for and view Financial Awareness Counseling completion information and counseling responses on the COD website.
Business Rules for Financial Awareness Counseling

1. Financial Awareness Counseling is optional.
   
   a. Financial Awareness Counseling does not satisfy the regulatory requirements for Entrance Counseling
   
   b. Financial Awareness Counseling cannot be required as a condition for disbursement of loan funds

2. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information will be available in COD.

3. The following school options are being added to the School Options page on the COD Web site and can be updated at any time:
   
   a. Financial Awareness Counseling Response Frequency
      
      i. On-Demand
      
      ii. Daily

4. New schools are defaulted to ‘On-Demand’ for the ‘Financial Awareness Counseling Response Frequency’ option.

5. A system generated response will be sent to schools for Financial Awareness Counseling using existing message class CRECMYOP with a new counseling type value defined as ‘StudentLoanCounseling’.

6. Financial Awareness Counseling will be identified as award type ‘SLC’ on the batch results page.

7. Financial Awareness Counseling completion information will be retrievable by authorized users on the existing Counseling Search page under the Person tab.
   
   a. If a school chooses not to receive Financial Awareness Counseling responses, completion information will be available via the counseling search page.
   
   b. If a user chooses not to notify a school of their counseling completion, the information will only be retrievable via user SSN.
   
   c. School users will be able to download the counseling search results as a .csv file after the search results are returned.

8. The existing DL Entrance Counseling Report will be renamed the Counseling Report.

   If a StudentAid.gov user selects to notify a school of Financial Awareness Counseling completion results, the result will be
included in the Counseling Report regardless of whether the school has selected to receive responses or not.

**Direct Loan Exit Counseling**

In February 2021, Direct Loan Exit Counseling on StudentAid.gov was redesigned and it meets the regulatory requirements. A demo of the counseling is viewable outside login. Schools have the option to receive “Daily” or “On-demand” responses when a borrower completes exit counseling on StudentAid.gov. The exit counseling reports available on NSLDS will continue to be available with data received from StudentAid.gov. The COD Counseling Report includes exit counseling completion information.

Note: The Counseling Type tag is populated with 'ExitCounseling' (without spaces) in the response.

School users are also able to search for and view exit counseling completion information and counseling responses on the COD Web site.

**Business Rules**

1. Completing exit counseling electronically on StudentAid.gov is optional

   a. Electronic exit counseling satisfies the regulatory requirements for exit counseling

2. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information to be available in COD.

3. The following school option is available on the COD Web School Options page and can be updated at any time:

   a. Exit Counseling Response Frequency

      i. On-Demand

      ii. Daily

4. New schools are defaulted to ‘Daily’ for the ‘Exit Counseling Response Frequency’ option.

5. Schools that were not participating in entrance counseling were defaulted to ‘On-demand’ for the ‘Exit Counseling Response Frequency’ option.

6. A system generated response is sent to schools for exit counseling using existing message class CRECMYOP with `<CounselingType>` tag defined as ‘ExitCounseling’.

7. Exit counseling completion information is available on the COD Web Counseling Search page under the Person tab.

   a. If your school is not selected by the student, exit counseling completion information is only retrievable using the student’s SSN.
b. Authorized users are able to download the counseling search results as a .csv file after the search results are returned.

8. If a StudentAid.gov user selects a school to notify of exit counseling completion, the completion information is included in the Counseling Report regardless of the frequency to receive responses the school selected.

**PLUS Credit Counseling**

PLUS Credit Counseling is available on StudentAid.gov. Anyone can complete PLUS Credit Counseling. A demo of the counseling is viewable outside of login.

The PLUS Credit Counseling Completion Status is available on the following COD Web pages:

- Credit Check Information
- Batch Search
- Search Results
- Batch Detail Information (only if viewing a CS response)
- Response Information (only if viewing a CS response)

PLUS Credit Counseling Completion status is included in the Credit Status Report.

**Business Rules**

1. PLUS applicants who have obtained an approved endorser or an approved credit appeal due to extenuating circumstances are required to complete PLUS Credit Counseling before the loan may be disbursed. (See the Direct PLUS Loan Credit Check section).

2. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information to be available in COD.

3. The Credit Status Response is sent to schools associated with a PLUS applicant with a denied credit decision when he/she completes counseling. (See the Generating Credit Status Responses section).

4. Schools can search by SSN for PLUS Credit Counseling on the COD Web Counseling Search Page.

5. Authorized users are able to download the counseling search results as a .csv file after the search results are returned.

**Direct PLUS Loan Requests**

The Direct PLUS Loan Request is an electronic form used to gather and communicate borrower and student information to the school to aid in the origination process. The PLUS Loan Request processing includes borrower-initiated credit check. The PLUS Loan Request is stored on the COD system and responses are sent to participating schools to enable them to create a PLUS loan.
Business Rules

1. The StudentAid.gov Web site allows borrowers to complete a Direct PLUS Loan Request which includes a credit check.

2. Completion of a Direct PLUS Loan Request on StudentAid.gov doesn’t create a Direct PLUS Loan on the COD System.

3. The StudentAid.gov website will perform a check of the applicant’s default status from NSLDS.

4. If a borrower’s credit decision is denied, the borrower is prompted to select one of the following options:
   - I want to obtain an endorser
   - I want to provide documentation of extenuating circumstances
   - I do not want to pursue a Direct PLUS loan at this time
   - Undecided

5. An endorser is able to complete an endorser addendum via the StudentAid.gov Web site and submit it online. Note: Endorsers still have the option of submitting a paper endorser addendum.

6. A response will be sent to notify the school that a Direct PLUS Loan Request has been completed and include the results of the credit check and the default status.

7. An Application ID will be generated and assigned to each completed Direct PLUS Loan Request. This identifier is for reference purposes only and is not required for PLUS award processing.

8. A new Relationship to Student <RelationshipToStudent> tag will be added in a future update to the PLUS Application response for Parent borrowers with the following values:
   - P = Biological Parent of the Dependent Undergraduate Student
   - A = Legal Adoptive Parent of the Dependent Undergraduate Student
   - S = Spouse of the Biological or Legal Adoptive Parent of the Dependent Undergraduate Student and am considered to be a parent in accordance with the instructions on the Free Application for Federal Student Aid (FAFSA) for reporting my income and assets on the FAFSA.
   - O = Other

Examples
Below is a PLUS Application Response for a Borrower with Accepted credit:
Please refer to the Common Record Layout, for the list of XML tags and valid values.

**Deferment, Forbearance & Repayment Plan Forms**

StudentAid.gov contains additional deferment, forbearance, and repayment plan forms available to users for download.

**TEACH Grant Initial and Subsequent Counseling**

Students are able to complete a TEACH Grant Initial and Subsequent Counseling session on the StudentAid.gov website. After login, the student may view previously submitted TEACH Grant Initial and
Subsequent Counseling sessions or choose to complete a new TEACH Grant Initial and Subsequent Counseling session.

**Business Rules for TEACH Grant Initial and Subsequent Counseling**

1. Students must complete TEACH Grant Initial and Subsequent Counseling each Award Year that they are receiving a TEACH Grant.
2. Students must complete TEACH Grant Initial and Subsequent Counseling before they can sign their TEACH Grant Agreement to Serve or Repay (Agreement).
3. A system generated response is sent to schools for TEACH Grant Initial and Subsequent Counseling records using the existing message class CRACXXOP (XX=Award year) with a value on the <CounselingType> tag defined as ‘TEACHCounseling’.
4. TEACH Grant Initial and Subsequent counseling completion information is available on the COD Web Counseling Search page under the Person tab.

**Example**

Below is a sample TEACH Grant Initial and Subsequent Counseling Response:

```
O*N05TG01005 ,CLS=CRAC22OP,XXX,BAT=000000000000000000002019-01-28T22:29:51.0100000001,"<?xml version="1.0" encoding="UTF-8"?>
  <TransmissionData>
    <CreatedDateTime>2019-01-28T11:45:53.11</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000124</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>P</FullResponseCode>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>10000124</RoutingID>
  </ReportingSchool>
  <AttendedSchool>
    <RoutingID>10000124</RoutingID>
    <Student>
      <Index>
        <SSN>888123456</SSN>
        <BirthDate>1969-05-14</BirthDate>
      </Index>
    </Student>
  </AttendedSchool>
</CommonRecord>
```
The TEACH Agreement To Serve or Repay (Agreement) is the approved promissory note for TEACH grants for all schools. The Agreement can only be submitted electronically via the StudentAid.gov Web site.

**Business Rules for All Agreements**

1. A TEACH Agreement to Serve or Repay (Agreement) is an agreement made by the student to meet the teaching service requirements of the TEACH Grant Program, and the student’s promise to repay any TEACH Grant that is converted to a Direct Unsubsidized Loan if the student does not complete the required teaching service or otherwise does not meet the requirements of the TEACH Grant Program.

2. Students must complete an Agreement each Award Year that they are receiving a TEACH Grant.
3. An Agreement must be signed by the student before disbursing a TEACH grant
   a. An Agreement must be on file on the COD System before actual disbursements can be accepted by COD for associated grants.

4. When students complete an Agreement, an Agreement Acknowledgement is sent to the school the student selected while completing the Agreement.

**TEACH Grant Exit Counseling**

TEACH Grant Exit Counseling is available on StudentAid.gov. Students are required to complete a TEACH Exit Counseling session on the StudentAid.gov website. A demo of the counseling is available outside login. A TEACH Grant Counseling report is available on the COD Web site.

**Business Rules for TEACH Grant Exit Counseling**

1. Students must complete the TEACH Grant Exit Counseling session upon withdrawing or graduating from the school where they received their TEACH Grant.
2. TEACH Grant Exit Counseling provides information about fulfilling the TEACH Grant service obligation and explains the terms and conditions that apply if the TEACH Grant is converted to a Direct Unsubsidized Loan.
3. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information to be available in COD.
4. COD will notify the school(s) selected by a user in the TEACH Grant Exit Counseling completion process when the user successful completes the TEACH Grant Exit Counseling session.
5. A TEACH Grant Exit counseling completion information is available on the COD Web Counseling Search page under the Person tab.
   a. Authorized users are able to download the counseling search results as a .csv file after the search results are returned.

Below is a sample TEACH Grant Exit Counseling Response:

```
O*N05TG04454 ,CLS=CRAC22OP,XXX,BAT=0000000000000000000000002020-01-31T14:47:00.0100000001,
<?xml version="1.0" encoding="UTF-8"?>
<TransmissionData>
<DocumentID>2020-01-31T14:47:00.0100000001</DocumentID>
<CreatedDateTime>2020-01-31T14:48:15.91</CreatedDateTime>
</Source>
</COD>
</RoutingID>00000000</RoutingID>
</COD>
</Destination>
</School>
```
Pell Grant Award and Disbursement Process

**Pell Grant Correction Edits can be treated as Rejects**

The COD System provides an option for the processing of Pell Grant data that allows schools to choose if they want to accept corrections to the Pell Grant data they submit to the COD System, or if they would rather have the data rejected.

**Business Rules**
1. Schools may select an option to have Pell Grant data that fails edits rejected rather than receive corrections for that data.

2. This option applies to all edits that are marked as an Edit Type C/R in Volume II, Section 4 – Edits.

3. Both corrections and rejections utilize the same edit number to indicate which edit was set; the Response Indicator differentiates between corrected and rejected.

4. When returning Response Document files, the COD System returns an edit code, the field it pertains to and the value submitted for rejected data.

5. When returning Response complex elements, the COD System returns an edit code, the field to which it pertains, and the corrected value.

6. Unless the School contacts the COD School Relations Center to change this option, the COD System will correct their data.

7. In order to change this option, the school must contact COD School Relations.

**Reporting Pennies in the Award and Disbursement Amount Data Elements**

The Award and Disbursement Amounts on the Common Record may include pennies. In the Pell Grant Program, pennies can be reported as partial dollars or two zeroes.

**Business Rules**

1. The data elements for Award and Disbursement Amounts on the Common Record may include two digits to the right of a decimal point.

2. When the reported amount does not include a decimal point, the COD System infers a decimal point and two zeroes to the right of the last digit reported. For example, if a school reports 1000, the COD System infers a decimal and two zeroes and stores as 1000.00.

3. In the Pell Grant Program, schools may report partial dollars (3500.32)

   OR

   Zeroes in the last two digits (3500.00) for Award Amount and Disbursement Amount

   OR

   Report the whole dollar amount only (3500) and the COD System infers the decimal point and two zeroes and stores as (3500.00).
4. The Award and Disbursement Amount data elements are:
   a. Award Amount, <FinancialAwardAmount>
   b. Disbursement Amount, <DisbursementAmount>

5. When performing edits on the Award Amount, COD calculates the Pell Award Amount using the data provided by the school. If the COD calculated Award Amount contains partial dollar amounts, COD rounds up this Award Amount to the next whole dollar amount. This is the COD calculated Award Amount. COD compares the COD calculated Award Amount to the Award Amount <FinancialAwardAmount> reported by the school.
   a. If the school reported Award Amount is less than or equal to the COD calculated Award Amount, COD accepts the Award Amount.
   b. If the school reported Award Amount is greater than the COD calculated Award Amount, COD either:
      i. Rejects the school reported Award Amount, if the school has selected the option to have its Pell data rejected
      OR
      ii. Corrects the school reported Award Amount, if the school has selected the option to have its Pell data corrected.

Example 1
When reporting a Pell Grant Award Amount of $1250.34:
   1. Include the decimal point and two digits to the right:
      1250.34
      OR
   2. Include the decimal point and two zeroes to the right:
      1250.00
      OR
   3. Omit the decimal point and report the whole dollar amount only:
      1250

Then, the COD System infers a decimal point and two zeroes and stores 1250.00.

Do not submit 125000 as the COD System infers a decimal and stores this submission as 125000.00.

Example 2
Scenarios where COD will not round to the nearest dollar:

1. If 2019 Pell Award is $9142.50 and the Additional Eligibility Indicator is set to ‘true’ and the school submitted $9143.00 COD would correct the award down to 150% Pell Max Amount of $9142.50.

### Award Error

<table>
<thead>
<tr>
<th>Field</th>
<th>FinancialAwardAmount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Edit number</td>
<td>172</td>
</tr>
<tr>
<td>Description</td>
<td>INCORRECT AWARD AMOUNT WHEN ADDITIONAL ELIGIBILITY INDICATOR IS &quot;TRUE&quot;</td>
</tr>
<tr>
<td>Edit status</td>
<td>Corrected</td>
</tr>
<tr>
<td>Field value</td>
<td>9143</td>
</tr>
<tr>
<td>Corrected value</td>
<td>9142.5</td>
</tr>
</tbody>
</table>

### Establishing Pell Grant Award Information

Award information submitted to the COD System for a student from a specific Attended School applies to the entire award year for that student.

**Business Rules**

1. The COD System establishes only one set of Pell Grant Award information per Attended School Routing ID per student per award year.
   a. The first submission of Award information that is accepted by the COD System establishes the Pell Grant award for the student for that Attended School Routing ID for that award year.
   b. Subsequent submissions of Award information for that student, Attended School Routing ID, and award year are treated as an update to the original accepted data.

2. Pell Grant Award Amounts that establish the award cannot be zero on first submission.

3. The COD System will calculate the Scheduled Grant using the ‘Fulltime’ Pell Payment Schedule.

4. The COD System uses the CPS Transaction Number submitted with the Award information to pull the EFC reported for the student from the CPS and determine the student’s Scheduled Grant. The Scheduled Grant and the student’s Percentage of Eligibility Used at any other Attended campus(es) are used to determine the student’s maximum Award Amount for the entire award year.

5. The CPS Transaction Number reported in the Award information applies to all Pell Grant transactions for that award year.
6. The COD System uses the Scheduled Federal Pell Grant Payment and Disbursement Schedules to calculate the Scheduled Award and validate the Award Amounts.

7. If the Award Amount for the entire award year reported for the student exceeds the maximum Award Amount determined by the COD System, COD either corrects or rejects the Award Amount depending on the school’s selected option.
   a. If rejected, the School must determine the correct Award Amount and resubmit to the COD System using the student’s primary EFC.

8. If the Award information for a student changes, the School must submit the change to the COD System within 30 days of the date the School becomes aware of the change, or by the established Pell Grant reporting deadline, whichever comes first.

9. The COD System does not use the Award information to establish or adjust a school’s Pell Grant CFL. Only actual Disbursement information submitted with a Disbursement Release Indicator set to true can change a school’s Pell Grant CFL.

10. The COD System does not accept new Award information or increases to Award information after the established student award data submission deadline (September 30, 2022 for the 2021-2022 Award Year) or if a school is confirmed closed out unless:
   a. the school has been granted extended processing from this deadline

       OR

       is resubmitting an award and/or disbursement for a POP situation

       OR

       reducing an award or disbursement

       OR

       flagging the Coronavirus Indicator including any non-financial changes.

       Schools can request Extended Processing via the Request Reopen/Extended Processing link on the COD Web site.

Refer to the Pell Correction Edits to Be Treated as Rejection Edits topic for more information.
11. The COD System always accepts Award and Disbursement decreases until the funding year is cancelled without the need to request extended processing.

12. For the 2005-2006 Award Year and forward, the Secondary Expected Family Contribution (EFC) cannot be used to calculate a Pell Grant award and disbursement.
   a. The COD System ignores the Secondary EFC Indicator tag if submitted on an incoming record and edits the Award amount using the Primary EFC.
   b. The COD System does not return the Secondary EFC Indicator tag in the Response record on the incoming record.

13. The COD System requires the `<StudentEligibilityCode>` tag on all Pell Grant originations.
   a. The following data elements are required for a Pell Grant Award, if the Student Eligibility Code is 01, 11, or 12:
      a. Ability to Benefit Test Code
      b. Ability to Benefit Test Administrator Code
      c. Ability to Benefit Completion Date

14. A complete address is required to establish a Pell Grant award. However, these tags are not required to be submitted on the incoming record if it can be pulled from the CPS or the COD database.
   a. The data elements for a complete address are:
      i. Address, `<AddressLine>`
      ii. City, `<AddressCity>`
      iii. State/Province Code
         1. For domestic addresses
            `<StateProvinceCode>`
            a. Postal Code, `<PostalCode>`
            b. Country Code, `<AddressCountryCode>` (for international addresses only)
   b. If any of the address fields are blank, COD will attempt to pull these data elements from CPS or the COD database.
c. The COD System will pull the student address for the highest CPS transaction number for the most recent award year.

d. If a complete address cannot be found on CPS or the COD database, the Person and Award record will reject (Edit 021).

i. The school must resubmit the record with a complete address.

e. If a complete address is found on CPS or the COD database, the record will accept and the school will receive a warning message that a complete address exists on COD (Edit 120).

15. An eligible Citizenship Status is required to originate a Pell Grant on COD.

a. For Pell awards, the valid values for Citizenship Status Code are 1 (US Citizen) and 2 (Eligible Non-Citizen). If an invalid value is submitted, COD will reject the origination.

b. If a Citizenship Status Code is provided in the common record, COD will accept and store a valid value.

c. If a Citizenship Status Code is not provided in the common record, COD will attempt to pull the value from CPS.

i. If a valid value cannot be pulled from CPS, COD will reject the origination.

**Maximum Pell Eligibility for Dependents of Deceased Veterans who died in Iraq or Afghanistan after September 11, 2001**

In June 2009, Pell eligible students who were dependents of a veteran who died as a result of service in Iraq or Afghanistan after September 11, 2001 became eligible for the maximum Pell award as if they had a zero EFC.

In March 2010, the COD System began using the Department of Defense (DoD) match results from the student’s CPS record to populate the “Post 9/11 Deceased Veteran Dependent Indicator”, if the school includes the CPS transaction number containing the DoD match results when submitting the award.
COD uses the “DoD Match Flag,” a true or false value, field in the student’s CPS data to set the “Post 9/11 Deceased Veteran Dependent Indicator”. In addition, the check box is read-only for schools. If any alterations need to be made, schools must contact a customer service representative to change the indicator on the COD Web site. The value of this indicator is used to determine the student’s maximum Pell eligibility.

**Business Rules**

1. Students must have completed a Free Application for Federal Student Aid (FAFSA®) in order to be eligible for the maximum Pell award if they are the dependent of a deceased Veteran.

2. Pell Awards will be rejected if the corresponding CPS transaction is rejected OR if the student is not Pell eligible, regardless of the value of the new indicator.

3. If the indicator is submitted or stored as true, Pell eligible students qualify for Pell Grants with an SFPG calculated using an EFC of zero.

4. An award level warning edit (Edit 168) will be returned with any award or disbursement activity when the indicator is submitted or stored as “true”.

5. The “Post 9/11 Deceased Veteran Dependent Indicator” is populated by COD through an evaluation of the student’s CPS data. The value of this indicator is used to determine the student’s overall maximum Pell eligibility.
   a. COD will use the “DoD Match Flag,” a true or false value, field returned in the student’s CPS data to set the “Post 9/11 Deceased Veteran Dependent Indicator”,
   b. For new students or students with a “blank” value for the “Post 9/11 Deceased Veteran Dependent Indicator”, COD will use the value from the student’s CPS data to determine a student’s maximum Pell Eligibility.
   c. The value of the “DoD Match Flag” on the CPS data cannot change the “Post 9/11 Deceased Veteran Dependent Indicator” value to “false”.

**For Pell-Ineligible Students**

Beginning in July 2010, Pell-ineligible students who were dependents of a veteran who died as a result of service in Iraq or Afghanistan after September 11, 2001 became eligible for the new Iraq and Afghanistan Service Grant Award.

In March 2010 and forward, the values of the DoD match flag are the main way to populate the “Post 9/11 Deceased Veteran Dependent” indicator. Contacting customer service to alter the indicator should be used as an exception-based process.
6. The “Post 9/11 Deceased Veteran Dependent Indicator” cannot be submitted on the Common Record and will not be returned in the Common Record response.

Maximum Pell Eligibility under the Children of Fallen Heroes Scholarship Act

Under certain conditions, an otherwise Federal Pell Grant eligible student whose parent or guardian died in the line of duty while actively serving as a police officer, firefighter, or other public safety officer, may receive a maximum Pell Grant award regardless of the student’s calculated expected family contribution (EFC).

The Children of Fallen Heroes (CFH) Indicator was added to Pell Grant award pages for Award Years 2018-2019 and 2019-2020. This indicator allows schools to certify a student’s increased eligibility for Pell under this provision on the COD Website.

For the 2018-2019 Award Year and forward, the COD Web site displays the CFH Indicator on the Pell Grant award pages. This indicator is only available on the COD Web site.

The following business rules are for processing the CFH Indicator for 2020-2021 Award Year and forward:

In April 2020, the COD System began linking the Children of Fallen Heroes Indicator results from the selected CPS record to populate the “CFH Indicator” in COD, if the school submits a CPS transaction number containing a Children of Fallen Heroes field, it shall be set to yes. COD uses the “Children of Fallen Heroes Indicator”, a true or false value field in the student’s CPS record, to set the “CFH Indicator” for the Pell Award. In addition, this is read-only field. If the value carried on CPS record is yes, the CFH indicator is yes. If the value carried on the CPS record is no, the CFH indicator is set to no. The value of the CFH Indicator is used to determine the student’s maximum Pell Scheduled Award.

Business Rules

1. If the CFH Indicator is “Yes,” the COD System will calculate the student’s Scheduled Award Amount as if the EFC were zero, regardless of the Pell-eligible EFC associated with the CPS transaction number selected for awarding.
2. If the CFH Indicator is “No,” the COD System will calculate the student’s Scheduled Award Amount using the EFC associated with the CPS transaction number selected for awarding.
3. A change to the CFH Indicator is based on a change to the corresponding CPS Transaction.
   a. If the value of the CFH Indicator on the Pell award is changed based on a change in the corresponding CPS record Children of Fallen Heroes Indicator (i.e. set from “yes” to “no”) during maintenance, the COD System will recalculate the Scheduled Award amount using the EFC that is stored on the associated CPS Record and the
COA of the award. When a Pell award’s CFH Indicator is unset, the recalculated Scheduled Award amount may put the student’s Pell awards into a Negative Disbursement scenario.

4. An award level warning edit (Edit 224) will be returned in the Common Record Response with any Pell award or disbursement activity when the CFH Indicator is stored as “true” on the Pell Award.

   a. The Edit will be returned on the Response Error Field with “CFHIndicator” within the Award Response Block

   b. Warning Edit 224 will only be applicable for the 2018-2019 Award Year and forward.

5. The CFH Indicator cannot be submitted on the Common Record and will not be returned in the Common Record response. A Pell Grant Award may be submitted using a CPS transaction that will link to the Children of Fallen Heroes results that will correctly set the CFH Indicator on that award and set maximum Pell.

**Disbursement Sequence Number Required on all Disbursements**

A Disbursement Sequence Number must be reported for all disbursements. This is an indicator of a single transaction associated with a specific disbursement number.

**Business Rules**

1. The Disbursement Sequence Number determines the order in which the transaction must be processed for a given Disbursement Number.

2. The Disbursement Sequence Number must be reported in an incremental, ascending order.

3. The Disbursement Sequence Number valid values range from 01-99.

   a. Disbursement Sequence Numbers 1-65 are reported by schools.

   b. Disbursement Sequence Numbers 66-90 are reserved for COD system-generated adjustments to actual disbursements and actual disbursement information submitted online via the COD Web site.

   c. Disbursement Numbers 91-99 are reserved for DMCS Overpayments (in descending order).

4. The Disbursement Sequence Number must be reported as “01” when the Disbursement Release Indicator is set to false.

5. Duplicate Disbursement Sequence Numbers for the same Disbursement Number when the Disbursement Release
Indicator is set to true are considered duplicate disbursement transactions.

6. When resubmitting a disbursement transaction that was rejected, the resubmission must use the same Disbursement Sequence Number that was rejected.

7. The <DisbursementSequenceNumber> tag is returned in the disbursement response complex element in all Full or Standard Common Record Responses.

8. The tag <PreviousSequenceNumber> is returned in all Common Record disbursement response complex elements with Disbursement Sequence Number greater than 1, including COD system-generated ND, PS, and WB responses, to indicate the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

**Disbursement Release Indicator**

The Disbursement Release Indicator is used to identify disbursements that are used to substantiate cash that has been drawn down or may lead to a change in the CFL.

**Business Rules**

1. Disbursement information is submitted to the COD System with a Disbursement Release Indicator equal to true or false.

2. Disbursements with a Disbursement Release Indicator set to false do NOT change the CFL. False indicates anticipated disbursement information.

3. Disbursements with a Disbursement Release Indicator set to true may change the CFL. True indicates actual disbursement information.

4. If the Disbursement Release Indicator is omitted from the Common Record, the COD System sets it to false.

5. Depending on the funding method employed by the school, the COD System may accept Disbursement information with Disbursement Release Indicator set to true in advance of, on, or after the disbursement date.

6. If the Disbursement Release Indicator is set to true, the disbursement is processed only if the required tags in the Disbursement complex element are complete.

7. A Disbursement Release Indicator set to true cannot be updated to false.

Refer to the Submitting Pell Grant Disbursement Information and Disbursement Release Indicator topic for more information.

For information on the required tags in the Disbursement complex element, refer to the topic entitled Minimum Data Elements Required for Document Processing.
8. To make an adjustment to an accepted and posted actual disbursement, the Disbursement Release Indicator must be set to true.

9. The Disbursement Release Indicator can be updated and disbursements can be generated, updated and adjusted on the COD Web site.

**Submitting Pell Grant Disbursement Information and Disbursement Release Indicator**

The COD System can accept Pell Grant Disbursement information in advance of, on, or after the disbursement date.

**Business Rules**

1. Disbursement Date is defined as the date cash was credited to the student’s account or paid to the student directly.

2. The COD System must accept an Award Amount greater than zero ($0) before it can accept Disbursement information for that student.

3. A student can have up to 20 disbursements (Numbers 1-20).

4. Pell Grant Disbursement Amounts cannot be zero on first submission.

5. The Disbursement Date may range from the date the 2021-2022 Pell Payment Schedule is published on Knowledge Center (TBA) until 2027-09-30 (September 30, 2027). A Knowledge Center communication will inform schools when the earliest date actual disbursement data (DRI=true) may be submitted for 2021-2022.

6. Schools will only receive Warning Edit 055 in the following conditions:
   
a. Disbursement Sequence Number = 1

   AND

   b. Disbursement Information received and processed more than 30 days later than the Disbursement Date reported on the record,

   AND

   c. Disbursement Release Indicator (DRI) = true

   **Note:** While Warning Edit 055 looks at actual disbursement records submitted more than 30 days after the actual Date of Disbursement, regulations require schools to submit all actual disbursements to
the Department within 15 days of the actual disbursement date.

7. The COD System accepts Disbursement information for anticipated disbursements (DRI = false) and actual disbursements (DRI = true).
   
a. The required data elements for a Pell Grant anticipated disbursement are:
   
i. Disbursement Number, <DisbursementNumber>""
   
ii. Disbursement Amount, <DisbursementAmount>
   
iii. Disbursement Date, <DisbursementDate>
   
iv. Disbursement Release Indicator set to false, <DisbursementReleaseIndicator = "false">
   
v. Enrollment School Code, <EnrollmentSchoolCode>
   
vi. Payment Period Start Date <PaymentPeriodStartDate>
   
vii. Published Program Length Years <PublishedPgmLengthYears>
   
viii. Published Program Length Months <PublishedPgmLengthMonths>
   
ix. Published Program Length Weeks <PublishedPgmLengthWeeks>
   
x. Weeks Programs Academic Year <WeeksProgrmasAcademicYear>
   
xii. Program Credential Level <ProgramCredentialLevel>
   
xiii. Enrollment Status <EnrollmentStatus>
   
xiv. Program CIP Code <ProgramCIPCode>
   
xv. Program CIP Code Year <ProgramCIPCodeYear>
   
As of October 2016, for Award Years 2016-2017 and forward, COD rejects all Payment Period Start dates which fall outside of the valid date ranges. Invalid payment period start date ranges will be rejected with existing edit 996.

Note: Payment Period Start Date is only required if there was a period of ineligibility at the school.
b. The required data elements for an actual Pell Grant disbursement are:

i. **Disbursement Number**, `<Disbursement Number= " ">`

ii. **Disbursement Amount**, `<DisbursementAmount>`

iii. **Disbursement Date**, `<DisbursementDate>`

iv. **Disbursement Release Indicator** set to true, `<DisbursementReleaseIndicator = true>`

v. **Disbursement Sequence Number**, `<DisbursementSequenceNumber>`

vi. **Enrollment School Code**, `<EnrollmentSchoolCode>`

vii. **Payment Period Start Date** `<PaymentPeriodStartDate>`

viii. **Published Program Length Years** `<PublishedPgmLengthYears>`

ix. **Published Program Length Months** `<PublishedPgmLengthMonths>`

x. **Published Program Length Weeks** `<PublishedPgmLengthWeeks>`

xi. **Weeks Programs Academic Year** `<WeeksProgramsAcademicYear>`

xii. **Special Programs** `<SpecialPrograms>`

xiii. **Program Credential Level** `<ProgramCredentialLevel>`

xiv. **Enrollment Status** `<EnrollmentStatus>`

xv. **Program CIP Code** `<ProgramCIPCode>`

xvi. **Program CIP Code Year** `<ProgramCIPCodeYear>`

Note: Payment Period Start Date is only required if there was a period of ineligibility at the school.

8. The valid values for Program Credential Level are:

   • 1: Undergraduate certificate or diploma program
2. Associate’s degree
3. Bachelor’s degree
4. Post Baccalaureate certificate
5. Master’s degree
6. Doctoral degree
7. First Professional degree
8. Graduate/Professional certificate
9. Non-credential programs (preparatory coursework/teacher certification)

9. The COD System shall validate that only one of the three tags <PublishedProgramLengthYears>, <PublishedProgramLengthMonths>, or <PublishedProgramLengthWeeks> is submitted on an incoming record. If more than one is submitted, the system will reject with edit 202.

10. The <WeeksProgramsAcademicYear> tag is only valid for the 2017-2018 Award Year and forward.

a. The Weeks Programs Academic Year is the Title IV Academic Year and must be greater than or equal to 26. The COD system will reject the record with edit 209 if the Weeks Programs Academic Year is less than 26.

b. Weeks Programs Academic Year
   <WeeksProgramsAcademicYear> must be submitted when
   <PublishedPgmLengthMonths> or
   <PublishedPgmLengthWeeks> is submitted, or the
   <SpecialPrograms> is set to "Preparatory Coursework Graduate Professional Program."

c. The <WeeksProgramsAcademicYear> tag will be ignored if submitted with the <PublishedPgmLengthYears> and will not be stored.

d. The <WeeksProgramsAcademicYear> tag is optional when submitting changes to a disbursement.

e. Weeks Programs Academic Year
   <WeeksProgramsAcademicYear> must be submitted when changing the Special Program to ‘Preparatory Coursework Graduate Professional Program’ or submitting
   <PublishedPgmLengthMonths> or
   <PublishedPgmLengthWeeks> when
   <PublishedPgmLengthYears> was previously submitted for the disbursement.

11. The Special Programs <SpecialPrograms> is only valid for the 2017-2018 Award Year and forward. If the tag is
submitted it must include one of the following valid values for Special Programs:

1. ‘A’ – Selective Admission Associated Program
2. ‘B’ – Bachelor’s Degree Completion Program
3. ‘N’ – Not Applicable
4. ‘P’ – Preparatory Coursework Graduate Professional Program
5. ‘T’ – Non-Credential Teacher Certification Program
6. ‘U’ – Preparatory Coursework Undergraduate Program

12. The COD system will require the Enrollment Status and CIP code on Pell Disbursements

<EnrollmentStatus>
iv. < EnrollementStatus > For Pell and Iraq & Afghanistan Service Grant the enrollment status for the period for which the disbursement is being made.
v. The valid values for <EnrollmentStatus> are:
   1. ‘F’ - Full Time = 1.00
   2. ‘Q’ - Three-quarters Time = 0.75
   3. ‘H’ - Half Time = 0.50
   4. ‘L’ - Less than half time
vi. <EnrollmentStatus> is optional when submitting changes to disbursements and should only be resubmitted if the original submission was incorrect.
vii. In order to change the tag on a funded disbursement, the disbursement sequence number must be incremented.

<ProgramCIPCode>
viii. The valid CIP codes can be found at the following location: https://nces.ed.gov/ipeds/cipcode/default.aspx?y=56
ix. The COD System will reject an invalid CIP Code with edit 204.
x. A valid <ProgramCIPCode> must be submitted with a disbursement upon origination.

<ProgramCIPCodeYear>
xii. The COD System will reject an invalid CIP Code Year with edit 204.

13. The COD System shall validate that the value in the <WeeksProgramsAcademicYear> field is greater than 26. If it is less than 26 weeks the COD system will reject with edit 209.

14. When reporting a disbursement adjustment to the COD System, replacement Disbursement Amounts must be
reported rather than the amount of the reduction or increase to the existing Disbursement Amount.

15. Pell Grant CFL changes, if applicable, are driven by:
   a. **Disbursement Date**, &lt;DisbursementDate&gt;
   b. **Disbursement Release Indicator** set to true, &lt;DisbursementReleaseIndicator = true&gt;

16. Depending on the funding method employed by the school, the COD System may accept Disbursement information in advance of, on, or after the disbursement date.

17. Schools designated as Advance Funded may submit a Disbursement Release Indicator set to true up to 7 calendar days before the Disbursement Date.
   a. If the current date exceeds 7 calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with error code 051.
   b. If the current date is within seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement.

### Example: Schools Participating in Advance Funded

<table>
<thead>
<tr>
<th>Date Sent</th>
<th>Disbursement Number</th>
<th>Sequence Number</th>
<th>Disbursement Date</th>
<th>Disbursement Amount</th>
<th>Disbursement Release Indicator</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/1/2017</td>
<td>1</td>
<td>1</td>
<td>09/08/2018</td>
<td>$1500.00</td>
<td>true</td>
<td>Posted on 9/1/2017 (7 calendar days before disbursement date)</td>
</tr>
<tr>
<td>02/01/2018</td>
<td>2</td>
<td>1</td>
<td>02/08/2018</td>
<td>$1500.00</td>
<td>true</td>
<td>Posted on 2/1/2018 (7 calendar days before disbursement date)</td>
</tr>
<tr>
<td>03/01/2018</td>
<td>3</td>
<td>1</td>
<td>06/01/2018</td>
<td>$500.00</td>
<td>true</td>
<td>Disbursement rejected; School must resubmit Disbursement information within 7 calendar days of Disbursement Date.</td>
</tr>
</tbody>
</table>

18. Schools designated as Cash Monitoring 1 (HCM1) review status by the School Participation Team may submit a Disbursement Release Indicator set to true up to 7 calendar days before the disbursement date.
   a. If the current date exceeds seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with error code 051.
b. If the current date is within seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement.

Example: Schools Designated as Cash Monitoring 1 (HCM1)

<table>
<thead>
<tr>
<th>Date Sent</th>
<th>Disbursement Number</th>
<th>Sequence Number</th>
<th>Disbursement Date</th>
<th>Disbursement Amount</th>
<th>Disbursement Release Indicator</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/15/2018</td>
<td>1</td>
<td>1</td>
<td>09/08/2018</td>
<td>$1500.00</td>
<td>true</td>
<td>Disbursement rejected; School must resubmit Disbursement information within 7 calendar days of Disbursement Date.</td>
</tr>
<tr>
<td>02/01/2018</td>
<td>2</td>
<td>1</td>
<td>02/07/2018</td>
<td>$1500.00</td>
<td>true</td>
<td>Posted on 2/1/2018 (7 calendar days before disbursement date)</td>
</tr>
</tbody>
</table>

19. Schools designated as in the Reimbursement or Cash Monitoring 2 (HCM2) review status can submit a Disbursement Release Indicator set to true if the current date is equal to or after the Disbursement Date.
   
a. If the current date is before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with error code 051.
   
b. If the current date is equal to or after the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement upon review of documentation by the School Participation Team.

Example: Schools Designated as Reimbursement or Cash Monitoring 2 (HCM2)

<table>
<thead>
<tr>
<th>Date Sent</th>
<th>Disbursement Number</th>
<th>Sequence Number</th>
<th>Disbursement Date</th>
<th>Disbursement Amount</th>
<th>Disbursement Release Indicator</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/06/2017</td>
<td>1</td>
<td>1</td>
<td>09/08/2017</td>
<td>$1500.00</td>
<td>true</td>
<td>Disbursement rejected; School must resubmit Disbursement information on or after the Disbursement Date.</td>
</tr>
<tr>
<td>02/07/2018</td>
<td>2</td>
<td>1</td>
<td>02/07/2018</td>
<td>$1500.00</td>
<td>true</td>
<td>Posted on 2/7/2017 (On or after disbursement date, upon review of documentation by SPT)</td>
</tr>
</tbody>
</table>
Updating and Adjusting Pell Grant Disbursement Amounts and Dates

Disbursement Amounts and Dates must be changed using the same disbursement number, rather than reporting a new disbursement number.

Business Rules

1. To change a Disbursement Amount and/or Disbursement Date, the following data elements are required:
   a. Disbursement Release Indicator, `<DisbursementReleaseIndicator = "">`
   b. Disbursement Number, `<Disbursement Number= "">`
   c. Disbursement Sequence Number, `<DisbursementSequenceNumber>`
   d. Disbursement Amount, `<DisbursementAmount>`
   e. Disbursement Date, `<DisbursementDate>`

2. When changing a disbursement already reported to COD, the same Disbursement Number must be reported.

3. When changing a disbursement with a Disbursement Release Indicator = false, the Disbursement Sequence Number must be set to “1.”

4. When changing a disbursement that already has a Disbursement Release Indicator = true, the Disbursement Sequence Number must be unique. The next sequential Disbursement Sequence Number must be reported.

5. Disbursement Sequence Numbers for a specific Disbursement Number must be used in sequential order within the range of 1-65.

6. The Previous Sequence Number for a specific Disbursement Number is returned on all disbursement responses with Disbursement Sequence Number greater than 1 and can be used to determine the next Disbursement Sequence Number.

7. When changing the Disbursement Amount, replacement Disbursement Amounts must be reported, rather than an adjustment to the existing Disbursement Amount.

8. Disbursement Date is always the date the cash was credited to the student’s account or paid to the student directly for this specific Disbursement Number (Disbursement Sequence Number = 1). Disbursement Date is NOT the transaction date of the adjustment to the disbursement (Disbursement Sequence Number not equal to 1).
9. Schools must submit adjustments to actual disbursements (Disbursement Sequence Number not equal to 1) within 15 days of the transaction date.

10. Pell Grant disbursement amounts can be adjusted to $0.

Example
The following table illustrates the use of Disbursement Sequence Number and replacement Disbursement Amounts when making a change to an existing disbursement:

<table>
<thead>
<tr>
<th>Disbursement Number</th>
<th>Sequence Number</th>
<th>Disbursement Date</th>
<th>Disbursement Amount</th>
<th>Accepted YTD Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>09/01/2018</td>
<td>$2000.00</td>
<td>$2000.00</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>01/02/2018</td>
<td>$2000.00</td>
<td>$4000.00</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>01/02/2018</td>
<td>$1500.00</td>
<td>$3500.00</td>
</tr>
</tbody>
</table>

Processing System-Generated Pell Responses
COD system-generated Responses of Document Type ND (Negative Disbursement) are generated for several situations, including Verification Status Code W, Negative Pending Records, Potential Overaward Process, and Pell LEU deobligation reductions.

Business Rules
1. A Response Document of Document Type ND contains a system-generated Document ID.
2. The Response indicates the Disbursement Number to which the downward adjustment applies and a COD system-generated Disbursement Sequence Number between 66 and 90.
3. The Response contains the <PreviousSequenceNumber> indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

Example
Below is a sample Negative Disbursement Response:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
<TransmissionData>
  <CreatedDateTime>2017-06-03T17:40:18.06</CreatedDateTime>
  <Source>
    <COD>
      <RoutingID>00000001</RoutingID>
    </COD>
  </Source>
  <Destination>
    <School>
      <RoutingID>10004433</RoutingID>
    </School>
  </Destination>
  <FullResponseCode>F</FullResponseCode>
</TransmissionData>
<ReportingSchool>
  <RoutingID>10004433</RoutingID>
  <AttendedSchool>
    <RoutingID>10004433</RoutingID>
    <Student>
      <Index>
        <SSN>732998699</SSN>
        <BirthDate>1969-01-05</BirthDate>
        <LastName>STREU</LastName>
      </Index>
      <Pell>
        <FinancialAwardYear>2022</FinancialAwardYear>
        <CPSTransactionNumber>1</CPSTransactionNumber>
        <FinancialAwardAmount>1000</FinancialAwardAmount>
      </Pell>
      <Note>
        <SchoolNoteMessage>example</SchoolNoteMessage>
      </Note>
      <AttendanceCost>3000</AttendanceCost>
      <LowTuitionFeesCode>2</LowTuitionFeesCode>
      <VerificationStatusCode>V</VerificationStatusCode>
      <EnrollmentDate>2021-07-03</EnrollmentDate>
      <AdditionalEligibilityIndicator>false</AdditionalEligibilityIndicator>
      <Response>
        <ResponseCode>A</ResponseCode>
        <YTDDisbursementAmount>0.00</YTDDisbursementAmount>
        <TotalEligibilityUsed>100.000</TotalEligibilityUsed>
        <ScheduledGrant>1540.00</ScheduledGrant>
        <LifetimeEligibilityUsed>900.000</LifetimeEligibilityUsed>
        <DisbursementNumber="1">
          <DisbursementAmount>0.00</DisbursementAmount>
          <DisbursementDate>2021-07-25</DisbursementDate>
          <DisbursementReleaseIndicator>true</DisbursementReleaseIndicator>
        </DisbursementNumber>
      </Response>
    </AttendedSchool>
  </ReportingSchool>
</TransmissionData>
Valid values for the Verification Status Code tag are: \( \text{V}, \text{W}, \text{and} \ S \).

### Business Rules

1. The COD System valid values for the Verification Status Codes are:

\[
\begin{align*}
\text{V} & \text{ Verified} \\
\text{W} & \text{ Without Documentation} \\
\text{S} & \text{ Selected, but Not Verified}
\end{align*}
\]

2. The Verification Status Code is required from a business standpoint but is an optional tag from a technical standpoint.

3. The Verification Status Code tag may be omitted from the Common Record only if the student is not selected for verification by CPS or if a selected CPS transaction was received by the school after the student was no longer enrolled.

The verification status codes are “\( V \)”, “\( W \)”, and “\( S \)”. The conditions under which each verification status code should be used are as follows:

### Business Rules (cont’d)
4. School reported Verification Status Code is compared against the verification indicator on the highest CPS transaction number for that student and that award year.

5. Schools may receive two tags on the Common Record Response based upon how the school reported Verification Status Code compares to the information on file with CPS.

   a. CPS Verification Indicator, 
   \(<\text{CPSVerificationIndicator}>\), is returned if the school submits a Verification Status Code of blank or \(W\) and the CPS verification indicator is \(Y\) on any CPS transaction for that award year.

   b. Highest CPS Transaction Number, 
   \(<\text{HighestCPSTransactionNumber}>\), indicates the highest CPS transaction number on file for the student for that award year. The tag is returned if any transaction number on file with CPS is greater than the school reported transaction number.
6. The COD System generates a monthly Pell Verification Status Report that consists of those students with actual disbursements that have been selected for verification but for whom no verification activity has been reported to COD by the school.

**Deobligation of Funds Due to Verification Status “W”**

Upon request by FSA, the COD System can send warning messages and generate CFL decreases for schools that have students with Verification Status Codes of W (Without Documentation).

**Business Rules**

1. Upon request by FSA, the COD System produces and sends a list of students at the School with a Verification Status of W and sends a warning to the School that it must take action.

   a. The COD System lists the students with a Verification Status of W alphabetically by Last Name, by Attended School in the Reconciliation Report.
      
      i. The Reconciliation Report is sent to the school’s SAIG mailbox using the following message class: PGRC220P

   b. The text warning message indicates a date on which COD will reduce the students’ YTD disbursements to zero ($0.00) if the School has not reported to COD an acceptable Verification Status Code for each student.
      
      i. This warning message is sent to the school’s SAIG mailbox using the following message class: PGTX220P.

      ii. Appropriate award year is included in the text message.

2. After the date indicated in the warning message upon request by FSA, the COD System reduces all disbursements for students with a Verification Status of W to zero ($0.00) and generates negative disbursements, these are sent to the school in a response document type of ND.

   a. The COD system-generated disbursements with a document type ND contain a Disbursement Sequence Number between 66 – 90.

   b. The COD system-generated Response with a document type ND contains the <PreviousSequenceNumber> tag indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.
3. The School’s CFL is decreased as a result of the COD system-generated ND Response.
   a. The COD System sends a text message to the School indicating the CFL decrease.
      i. This text message is sent to the school’s SAIG mailbox using the following message class:
         PGTX22OP.
      ii. Appropriate award year is included in the text message.
   b. The COD System sends a revised Electronic Statement of Account report to the school to reflect the CFL decrease.

4. For the 2009-2010 Award Year and forward, the COD System will reject all Pell Award originations, award increases, change records which change the verification status of the Pell Award to W, disbursements, or disbursement increases for awards with verification status of W if the record is submitted after the Verification W cut-off date.
   a. If a school submits a new Pell Award origination with a verification status of W for the 2021-2022 Award Year Verification W cut-off date, the COD System will reject with Edit 145.
   b. If a school submits an award amount increase to a Pell Award with a verification status of W after the Verification W cut-off date, the COD System will reject with Edit 145.
   c. If a school attempts to change the existing verification status of a Pell Award to a value of W after the Verification W cut-off date, the COD System will reject with Edit 145.
   d. If a school submits a new Pell disbursement or disbursement increase for a Pell award with a verification status of W after the Verification W cut-off date, the COD System will reject with Edit 146.
      i. The date the batch is received by COD will be compared with the Verification W cut-off date.
      ii. Downward disbursements will continue to be accepted by the COD System after the Verification W cut-off date.

5. For the 2010-2011 Award Year and forward, once COD reduces a disbursement to zero due to Verification Status W, the COD System will allow changes to existing Disbursement information submitted with a Verification
6. To increase the disbursements from zero, the school must resubmit the disbursement information with the next sequential Disbursement Sequence Number and acceptable Verification Status Code of \( V \), \( S \) or blank.

**Negative Pending Records**

If an update to Pell Grant Award information produces an Award Amount that is less than the total of all accepted and posted Disbursement Amounts for that award, the COD System creates a Negative Pending Record for that award. The Response contains the Warning Edit 040 and the Negative Pending Amount tag.

**Business Rules**

1. If the total of all accepted and posted Disbursement Amounts (Disbursement Release Indicator = true) exceed the Award Amount for a Pell Grant Award, the COD System creates a Negative Pending Record for that award.

2. The COD System includes the Negative Pending Amount tag in the Response.
   a. The Negative Pending Amount tag indicates the difference between the sum of all accepted and posted Disbursement Amounts and the Award Amount.

3. The COD System allows a Negative Pending Record to exist for 30 calendar days.

4. The COD System does not accept Disbursement information with a Disbursement Release Indicator of true that would result in an increase to the total accepted disbursements for an award with a Negative Pending Record at COD.

5. Within 30 calendar days of receiving a Negative Pending Amount on the Response, the school must either:
   a. Increase the Award Amount by at least the Negative Pending Amount. *Please see Example 1.*
   OR

   b. Decrease the Disbursement Amount by at least the Negative Pending Amount. *Please see Example 2.*

6. If within 30 calendar days the COD System does not receive a change to the Award Amount or Disbursement Amount that meets the conditions above, COD reduces the disbursement by an amount equal to the Negative
Pending Amount and creates a negative disbursement. The system-generated Negative Disbursement is sent to the school in a Response with Document Type ND.

7. The COD system-generated Negative Disbursement Response contains

   a. Disbursement Number
   b. Disbursement Date (original disbursement date)
   c. A COD system-generated Disbursement Sequence Number between 66 and 90
   d. The <PreviousSequenceNumber> tag indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.
   e. Adjusted Disbursement Amount

**Example 1**
The Pell Award = $1200 and the Initial accepted Disbursement = $1700. Thus, the Negative Pending Amount is $500.

If the appropriate response is for the school to increase the Award Amount, the changed Award Amount must be $1700 or greater.

**Example 2**
The Pell Award = $1200 and the Initial accepted Disbursement = $1700. Thus, the Negative Pending Amount is $500.

If the appropriate response is for the school to decrease the Disbursement Amount, the adjusted Disbursement Amount must be $1200 or less.

**Concurrent Enrollment**
A student may not receive a Pell Grant at two or more schools concurrently. When more than one Attended School reports disbursements for a student and the enrollment dates are within 30 calendar days of each other, the COD System identifies a potential concurrent enrollment and sends a warning message to all schools involved.

**Business Rules**
1. A student may not receive a Pell Grant at two or more schools concurrently.
2. When the COD System receives disbursement information for a student from more than one Attended School for the same award year, the COD System checks whether EnrollmentDate> tags submitted by the schools are within 30 calendar days of each other.
3. If a potential concurrent enrollment situation exists, the COD System sends the school that submitted the disbursement information Warning Edit 069 on their Response document.

4. The COD System sends the school that submitted the disbursement information and all other schools with accepted disbursement information in COD for the student and that award year, a Multiple Reporting Record (MRR).

Deobligation Due to Pell LEU Exceeding 600%

A student’s Pell LEU may not exceed 600%. As a part of regular disbursement processing, the COD system will correct/reject disbursements which cause the student’s Pell LEU to exceed 600%.

If a student’s Pell LEU increases due to changes to a student’s Cost of Attendance or EFC as a result of updating the CPS transaction number, that student’s disbursements may exceed the award amount, and may be eligible for reduction as a part of the Pell LEU deobligation process.

Business Rules

1. If a recipient’s Pell LEU exceeds 600% without disbursement information being submitted to COD, the Pell grant may be included as a part of the Pell LEU deobligation process.

2. Pell grants will be reduced 30 days after the Pell LEU exceeded 600%.

3. Disbursements will be reduced so that the Pell LEU does not exceed 600%.

4. The reduced disbursement’s sequence number will be 66 if that is the first system generated negative disbursement for that disbursement. If that disbursement has been reduced as a part of a negative disbursement due to other deobligation processes, the sequence number will be incremented by one.

5. As of April 2014, schools are able to initiate a Pell LEU dispute via the Pell LEU History Page on the COD Web. There must be a Pell Grant on file for the student in order to initiate a dispute. The COD System will send a system generated negative disbursement response to a school’s TG mailbox when a disbursement has been reduced as a part of the Pell LEU deobligation process.

6. The updated reduced Pell LEU will be included in the ND response.

7. The associated school’s CFL will be reduced to NAPD the day after the Pell LEU deobligation reduction, if CFL equaled NAPD prior to the reduction.
**Year-Round Pell**

Beginning with Award Year 2017-2018, Pell eligible students may be able to receive up to 150% of the student’s Scheduled Federal Pell Grant (SFPG) in a single award year. A student's eligibility for the additional 50% over the standard 100% SFPG will be relayed through the submission of the `<AdditionalEligibilityIndicator>` (AEI) field in the Pell Award block.

The COD System will accept, store, display, and return the optional `<AdditionalEligibilityIndicator>` (AEI) Boolean field.

**Business Rules**

1. In order for a student to receive greater than 100% of the SFPG for Award Years 2017-2018, an AEI = “true” must be submitted in the Pell Award Block.

2. If the AEI tag is submitted as “true” for Award Years 2011-2012 through 2016-2017, the AEI tag will be corrected to “false” with Edit 995 if the school’s error processing option is set to ‘correcting’. If the school’s error processing option is set to ‘rejecting’, the Pell Grant will be rejected.

3. Edit 039 will continue to be triggered when a school submits a Pell Award with the AEI equal to “false” only if it exceeds the limit SFPG + |Sum of disbursements represented by the student’s Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) for that school and award year|.

4. If the AEI is set to “true” on a Pell Grant where the Total Disbursed Amount is greater than zero, the COD System will allow a student’s TEU to equal 150% plus the absolute net value of Closed School LEU Restoration Adjustments for that award year.

   a. Edit 172 will trigger if the AEI is set to “true” and the Award Amount submitted is greater than 150% of the SFPG + |Sum of disbursements represented by the student’s Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) for that school and award year|.

5. If the AEI is not submitted or is set to “false”, the COD System will allow the TEU to equal 100% plus the absolute net value of Closed School LEU Restoration and the Disaster Relief Adjustments for that award year.

The AEI is only to be set for students that will be disbursed more than 100% of their SFPG. Schools should delay setting the AEI to true until they are sure of this.

Beginning in Oct 2017, Pell eligible students may be eligible to receive up to 150% SFPG in a single award year, for the 2017-2018 Award Year and forward as a result of amendments to Section 401(b)(8) of the Higher Education Act.
6. For the 2017-2018 Award Year and forward, awards will be placed in a POP situation if the student has two or more Pell awards for an award year and their TEU exceeds their limit. The AEI will now be a determining factor if a student is either placed and/or removed from a POP situation. Please reference the Pell Potential Overaward Process (POP) Section of this Technical Reference for more information.

7. Pell awards will be placed in a Negative Pending situation if the Award Amount is reduced to a value less than the funded Disbursement Amount, regardless of the AEI value for an award.

   a. If the AEI is changed from “true” to “false”, and the Award Amount is greater than the SFPG + |Sum of disbursements represented by the student’s Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) for that school and award year|, the COD System will trigger the Award Level Rejecting/Correcting Edit 173.

   b. If the AEI is changed from “true” to “false”, and the Award Amount is reduced to a value less than the funded Disbursement Amount, Award Level Warning Edit 174 will trigger.

8. Negative Disbursement Responses will contain the <AdditionalEligibilityIndicator> tag if the field was submitted by the school and accepted by COD for the associated Pell award. The tag may contain a value of “true” or “false” and will be returned in the Pell Award Block of the Negative Disbursement Response. If the tag was not submitted by the school or not accepted by COD, the tag will not be returned.

**Pell Administrative Cost Allowance (ACA)**
The COD System calculates and pays ACA amounts.

**Business Rules**

1. The COD System calculates ACA amounts based on the number of unduplicated recipients at each Reporting campus.

2. The COD System pays ACA for students with at least one accepted and posted disbursement during the course of an award year.

3. The COD System disburses ACA multiple times during the award year.

4. The Administrative Cost Allowance processing option allows schools to indicate whether or not it will receive the Pell Administrative Costs Allowance (ACA) for each award year.

Closed schools in Pell Potential Overaward Process (POP) will not have their disbursements reduced to zero.
a. The Administrative Cost Allowance processing option can be viewed on the COD Web site.

b. Schools may contact COD School Relations to request that FSA change this option.

5. The COD System will process decreases in ACA obligations.

The COD System will generate and send an Electronic Statement of Account (ESOA) to the School’s SAIG mailbox when they receive an ACA.

**Pell Potential Overaward Process (POP)**

A student may receive disbursements from more than one Attended School during the course of an award year. When more than one Attended School reports disbursements for a student, the COD System checks to make sure that the student has not received:

a. A TEU greater than 100% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments for that award year and the AEI is not set to “true” for any awards with funded disbursements greater than $0 in that award year.

OR

b. A TEU of greater than 150% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments for that award year and the AEI is set to “true” for at least one award with funded disbursements greater than $0 in that award year.

Section 34CFR 690.65 of the regulations provides the basis for determining a student’s remaining eligibility when another school has disbursed Pell Grant funds to the student:

- Calculate the percentage of Eligibility Used at each previous school by dividing the disbursements to the student at the school by the Scheduled Grant at that specific school;

- Calculate the percentage of Total Eligibility Used for the award year by adding the Eligibility Used for all schools the student previously attended;

- Calculating the net percentage of Closed School LEU Restoration Adjustments for the award year.

- Calculate the Remaining Eligibility when the AEI is:

  - Not set to “true” in that award year, subtract the Total Eligibility Used from the sum of (100% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments for that award year)
OR

- **Set to “true”** in that award year, subtract the Total Eligibility Used from the sum of (150% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments for that award year).

- The Remaining Eligibility is the percentage of the Scheduled Grant at the new school to which the student is entitled.

If the COD System receives disbursement information that places the student in a situation where he/she has received more than 100% (or 150% if AEI is set to “true”) of their SFPG, the student has entered a Potential Overaward Process (POP) situation. In a POP situation, the COD System accepts the disbursement information and notifies all schools involved that the POP situation must be resolved within 30 calendar days. If after 30 calendar days the situation has not been resolved, the COD System generates a Negative Disbursement for all of the student’s Pell disbursements at all schools for that award year. The eligible schools are then required to re-report accurate disbursement records to reinstate the student’s disbursements.

**Business Rules**

1. A student may not receive more than 100% of their SFPG for a Pell Grant plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments when the student does not have AEI set to “true” for any awards with net funded disbursements greater than $0 and in that award year.

2. A student may not receive more than 150% of their SFPG for a Pell Grant plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments when the student has AEI set to “true” for at least one award with net funded disbursements greater than $0 and in that award year.

3. A school to which a student transfers must determine the student’s Total Eligibility Used, considering disbursements made and the Scheduled Grant at each school the student previously attended in the award year.

4. When the COD System receives disbursement information for a student from more than one Attended School for the same award year, the COD System checks whether the student has received more than 100% (or 150% if AEI is set to “true”) of their total SFPG for a Pell Grant plus the absolute net value of Closed School LEU Restoration Adjustments.

5. If a POP situation exists, the COD System sends the school that submitted the Disbursement Information a Response document containing:
   a. Warning Edit 068 (Potential Overaward Process - Notice Sent Separately)
b. FSA Code value of PO (PO = Pell POP)

c. Total Eligibility Used (TEU) value greater than:

i. 100% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments when the student does not have AEI set to “true” any awards with net funded disbursements greater than $0 and in that award year.

ii. 150% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments when the student has AEI set to “true” for at least one award with net funded disbursements greater than $0 and in that award year.

6. The COD System sends the school that submitted the Disbursement Information and all other schools with accepted and posted Disbursement Information in COD for that student and that award year a Multiple Reporting Record (MRR).

7. The COD System sends a weekly Pell POP Report to schools that have an accepted actual disbursement for students that are in or have been in a POP situation for this award year.

8. The COD System allows a POP situation to exist for 30 calendar days from the date the student entered the POP situation (defined as the date the MRR for the POP situation is created).

9. During the 30 day period, each school involved in the Potential Overaward must review the student’s award and disbursements and apply the proper eligibility calculation.

10. During that 30-day period, the COD System can accept and post further disbursements that decrease or increase the student’s year-to-date disbursement amount.

11. The COD System accepts Disbursement Information from no more than 3 schools for a student in a POP situation.

12. If the student remains in a POP situation after 30 calendar days, the COD System reduces all accepted and posted disbursements to zero ($0.00) for that student and that award year at all schools involved.

13. Each school that correctly paid the student Pell Grant funds must re-report the student’s Disbursement Information to COD.

14. During the POP situation, the COD School Relations Center will take a proactive role in contacting the schools.
15. COD does not prevent the same schools from creating another POP situation for the same student.

16. COD School Relations will escalate the issue should the same schools create another POP situation involving the same student.

17. Students will be removed from POP status within 30 days from the date the student was initially placed in the POP based on either of the following conditions:

   a. The student’s TEU becomes 100% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments for that award year or below based on downward disbursement adjustments submitted by the schools and the student does not have an AEI of “true” for any award with net funded disbursements greater than $0, at a school within that award year.

   b. A school submits a maintenance record with an AEI of “true” for any award with net funded disbursements greater than $0, at a school within that award year, and the student’s TEU becomes 150% plus the absolute net value of Closed School LEU Restoration and Disaster Relief Adjustments for that award year or below.

Business Rules for Post-Deadline Processing (Extended Processing) and POP

1. Post-deadline processing continues for five years after the September 30th award year processing deadline. Therefore, a school with extended processing can trigger a POP situation for a student in an award year that another school has already finished processing.

2. Schools are encouraged to pay close attention to Pell POP Reports and Multiple Reporting Records (MRRs) received after the processing deadline for a prior award year.

3. In order to ensure proper distribution of funds, the COD System will reduce all disbursements for that student and that award year for ALL schools involved in the POP situation, regardless of if a school has extended processing for that award year.

4. Schools should work with Customer Service to resolve the POP situation during the 30-day period to prevent the COD System from negatively reducing disbursements after the processing deadline.

5. Schools do not need to request post-deadline processing (Extended Processing) to submit upward adjustment
records after the end of the processing year in order to correct a POP situation.

6. The COD System accepts downward adjustments to disbursement or award information at any time.

7. Disbursement information can be submitted via the COD Web site for those schools that do not wish, or are not able, to re-open any software they may have used to process the affected award year.

**Post-Deadline Processing**

The COD System provides Pell Grant post deadline processing for extended processing, audit adjustment, and resolution of POP situations. The Federal Pell Grant Program regulations at 34 CFR 690.83(a) establishes the deadline by which a school must submit student payment data each award year. The data must be submitted to the Department by September 30 following the end of the award year in which the Pell Grant is made.

**Business Rules**

1. After September 30th of the processing year, the COD System accepts and processes decreases to previously accepted award originations and decreases to previously accepted disbursements.

2. After September 30th of the processing year, the COD System accepts and processes previously accepted disbursements newly flagged with the Coronavirus Indicator including any non-financial changes.

3. After September 30th of the processing year, the COD System accepts and processes originations and disbursements of new awards or award amount increases only if the student was in a POP situation during the award year OR the Department has granted Extended Processing for the award year.

   a. Unless one of the above conditions are true, the COD System rejects new awards or award amount increases with error code 043 – New Award Amount or Award Increase Received After End of Processing Year and Institution Has Not Been Granted Extended Processing.

   Unless one of the above conditions are true, the COD System rejects new disbursements or disbursement amount increases with error code 071 – New Disbursement Increase to “Y” Received After End of Processing Year and Institution Has Not Been Granted Extended Processing.

4. September 30, 2027 is also the final deadline for funds availability for the 2021-2022 Pell Grant Award Year. After that time, schools will be unable to draw down or
adjust further funds via G5 (although refunds of cash will still be accepted), and the COD System will be closed to any further award or disbursement processing for that award year. As such, schools must complete all final reconciliation activities well before this final deadline and in accordance with cash management and disbursement reporting deadlines as published in the Federal Register annual Deadline Date Notice.

**Pell Lifetime Eligibility Used**

Pell Lifetime Eligibility Used (LEU) is the sum of all Eligibility Used (EU) for all award years. In July 2012, the functionality which only calculated Pell LEU for students who received their first actual disbursement in Award Year 2008-2009 and forward was retired. The new Pell LEU limit of 600% now applies to all Pell recipients for all award years. These calculations are made real time and displayed on the COD web.

In June 2013, the COD System began returning a new correcting/reject edit (Edit 201) if a disbursement causes a recipient to exceed the LEU limit of 600%. The edit will apply to Award Years 2012-2013 and forward.

**Lifetime Eligibility Used Calculation**

LEU % = Sum of ALL EU’s for all award years (archived and non-archived).

**Business Rules**

1. Beginning in July 2012, LEU is calculated for all Pell recipients.

2. COD returns the `<LifetimeEligibilityUsed>` tag in the Common Record Response for Pell Awards for the 2010-2011 Award Year and forward.

3. Two existing warning level edits will inform schools when students are nearing or have exceeded their LEU.

4. As of the 2010-2011 Award Year and forward, COD includes LEU in the system generated Negative Disbursement Responses for Pell.

5. 2012-2013 (and forward) Pell disbursements which cause the LEU to exceed 600% will be corrected/rejected.
   
   a. For rejecting schools, the system will reject the disbursement(s) with Edit 201.
   
   b. For correcting schools, the system will correct the disbursement(s) so that the LEU does not exceed 600%.

6. If multiple disbursements must be corrected, disbursements will be corrected beginning with the highest disbursement number.
7. A recipient’s Pell LEU may exceed 600% by changing the Cost of Attendance (COA) or Expected Family Contribution (EFC) as a result of updating the CPS transaction number.

   a. If a recipient’s Pell LEU exceeds 600% due to a change to the scheduled award amount, the Pell grant may be included as a part of the LEU deobligation process. Please refer to the Deobligation Due to Pell LEU Exceeding 600% section within the Implementation Guide of the Technical Reference.

**Pell Grant Closeout**

The COD System provides the ability for schools to perform end of program year closeout activities for Award Year 2016-2017 and forward.

The Pell data submission deadline is the last processing date of September following the end of the award year (i.e. for 2021-2022 the closeout deadline would be September 30, 2022). This is the last processing day of the program year, so all school data must be received and accepted by this date in order to be included in a school's final Cash > Net Accepted and Posted Disbursement (NAPD) balance for the year.

**Business Rules**

1. When the school’s internal Cash > NAPD balance is $0, is in agreement with the Department's official Cash > NAPD balance reflected in the school's most recent Pell Grant School Account Statement (SAS) for the award year, and the school has no outstanding issues for this program year, the school should complete the Program Year Closeout Balance Confirmation Form in COD Web. Once the school has successfully confirmed closeout the following actions with occur:

   a. The Department will send a Program Year Closeout letter to the school’s President and Financial Aid Director.

   b. COD will reject **upward** award or disbursement changes per published edits.

   c. The Department will reduce the school's Current Funding Level (CFL) to Net Accepted and Posted Disbursements.

   d. The SAS for this award year and program will no longer be sent.

**NOTE:** If the school should need to submit **upward** award or disbursement data for this year at a future time, they will need request to be reopened or request extended processing via the Request Reopen/Extended Processing page in COD.

2. COD will send the following closeout correspondence:

   a. **Balance Notification Letter:** Sent to schools as a reminder to finish processing and confirm closeout before the established data submission deadline.
b. **Program Year Closeout Letter**: Sent to schools once they have completed the Balance Confirmation process and are considered closed out for the requested program and award year. This includes completing the Balance Confirmation Page in COD Web and verifying their Cash > NAPD balance hasn’t changed.

c. **Reopen Change Letter Reopen Change Letter**: Sent to schools to notify them that they are no longer considered confirmed closed out for the award year because:
   
   iii. The school’s balances in the Common Origination and Disbursement (COD) System have changed and/or
   
   iv. Staff at school has requested to be reopened to continue processing via the Request Reopen/Extended Processing page on the COD Web site

d. **Extended Processing Letter**: Sent to schools that have been approved for an extension to the data submission deadline. Notifies the school of the expiration date of that extension.

**NOTE**: Schools can find a HTML copy of the above correspondence on the School Correspondence page via the COD Web site.
of a whether a school’s Pell Grant error processing option is set to ‘correcting’ or ‘rejecting’. Additionally, as outlined below, the Iraq and Afghanistan Service Grants POP, Negative Pending, and LEU Deobligation processing will only be applicable to Iraq and Afghanistan Service Grants in the 2017-2018 Award Year and forward. These functions will be performed separately from the Pell Grant program.

The COD System uses the Department of Defense (DoD) match results from the student’s CPS record to populate the “Post 9/11 Deceased Veteran Dependent Indicator”, if the school includes the CPS transaction number containing the DoD match results when submitting the Iraq and Afghanistan Service Grant award.

COD uses the “DoD Match Flag,” a true or false value, field in the student’s CPS data to set the “Post 9/11 Deceased Veteran Dependent Indicator” on the Person Information screen. If any alterations need to be made, schools must contact a COD customer service representative to change the indicator on the COD Web site. The value of this indicator is used to determine the student’s maximum Pell eligibility if they are Pell-eligible, and eligibility for the Iraq and Afghanistan Service Grant if they are Pell-ineligible.

Beginning with the 2017-2018 Award Year, students with an Additional Eligibility Indicator (AEI) value equal to ‘true’ will be able to receive 150% Scheduled Federal Pell Grant (SFPG) of their Iraq and Afghanistan Service Grant.

Establishing Iraq & Afghanistan Service Grant Award Information

The Iraq and Afghanistan Service Grant “IAS Grant” indicator has been added to Pell Grant awards for Award Years 2010-2011 and forward. This indicator will allow Pell-ineligible students, identified by the Department of Defense as a dependent of a veteran who died as a result of service in Iraq or Afghanistan, to be awarded Iraq and Afghanistan Service Grant funds.

For the 2010-2011 Award Year and forward, the COD Web site displays the “IAS Grant” indicator on the Pell Grant award pages. This indicator is only available on the COD Web site. The COD Web site allows authorized users to submit Iraq and Afghanistan Service Grants and submit updates to existing Iraq and Afghanistan Service Grants and disbursements.

Business Rules

1. Students must have completed a Free Application for Federal Student Aid (FAFSA®) in order to be eligible for the Iraq and Afghanistan Service Grant award if they were the dependent of a deceased Veteran.

2. The COD System establishes only one set of Pell Grant/Iraq and Afghanistan Service Grant award information per Attended School Routing ID per student per award year.
3. The Iraq and Afghanistan Service Grant must be created on the COD Web site.

4. Iraq and Afghanistan Service Grant Awards will be rejected if the corresponding CPS transaction is rejected OR if the student is Pell-eligible, regardless of the value of the “IAS Grant” indicator.

5. For Award Years 2017-2018 and forward, the COD System will allow a student to receive up to 1.5 times their SFPG if the Additional Eligibility Indicator is submitted as “true.”

6. The COD System uses the SFPG Payment and Disbursement Schedules to calculate the Iraq and Afghanistan Service Grant Scheduled Award and validate the Award Amount. The SFPG for an Iraq and Afghanistan Service Grant award will be the maximum SFPG for a Pell Grant award for the specific award year submitted, or the Cost of Attendance (COA) whichever is less.

7. The “IAS Grant” indicator will only be displayed on the Pell Grant Create Award page for a student whose applicant data meets the following criteria: Pell Eligible Flag = ‘false’ and DoD Match Flag = ‘true’.

8. The COD Web site will inform the authorized user if the provided CPS Transaction Number is invalid.

9. The “IAS Grant” indicator will only be displayed on the Award Detail Information page on the COD Web site if the “IAS Grant” indicator is stored as ‘true’.

10. When the COD System receives an Iraq and Afghanistan Service Grant award, the Pell Grant eligibility check (Edit 038) will not be performed. If a Pell Grant award is submitted with an “IAS Grant” indicator of ‘false’, the COD System will continue to validate a student’s Pell Grant Eligibility.

11. Iraq and Afghanistan Service Grants will not be applicable to Foreign Schools.

12. The COD System will not validate a student’s Verification Status on Iraq and Afghanistan Service Grant awards.

13. The “IAS Grant” indicator cannot be submitted on the Common Record.

14. The COD System will continue to send Web site Responses if a school has selected to receive them. However, the “IAS Grant” indicator will not be returned on the Web site Response regardless of the value submitted and stored on the COD System.

15. The COD System does not use the Award information to establish or adjust a school’s Iraq and Afghanistan Service Grant CFL. Only actual Disbursement information submitted with a Disbursement Release Indicator set to true can change a

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**Iraq and Afghanistan Service Grant Sequester-Limited Scheduled Award Amount:**
The SFPG for Iraq and Afghanistan Service Grants disbursed after March 1, 2013 are subject to sequester-required reductions. Please refer to the Sequester-Limited Scheduled Award Amount topic for more information.
school’s Iraq and Afghanistan Service Grant CFL. This is only applicable for Iraq and Afghanistan Service Grants submitted in the 2017-2018 Award year and forward starting in June 2018.

16. The COD System does not accept new Iraq and Afghanistan Service Grant Award information or increases to Award information after the established student award data submission deadline (September 30, 2022 for the 2021-2022 Award Year) or if a school is confirmed closed out for the Pell Grant program unless the school has been granted Pell Grant extended processing from this deadline.

AND

is resubmitting an Iraq and Afghanistan Service Grant award and/or disbursement for an Iraq and Afghanistan Service Grant POP situation

OR

reducing an Iraq and Afghanistan Service Grant award or disbursement

OR

submitting previously accepted disbursements newly flagged with the Coronavirus Indicator including any non-financial changes.

NOTE: To submit new Iraq and Afghanistan Service Grant information or increases to Award information after the award data submission deadline, schools must request Extended Processing for the Pell Grant program via the Request Reopen/Extended Processing link on the COD Web site.

17. The COD System always accepts Iraq and Afghanistan Service Grant Award and Disbursement decreases until the funding year is cancelled without the need to request extended processing for the Pell program.

**Submitting Iraq & Afghanistan Service Grant Disbursement Information and the Disbursement Release Indicator**

Beginning in June 2018, the COD System was modified to accept and process both actual and anticipated disbursements for Iraq and Afghanistan Service Grants in the 2017-2018 Award Year and all subsequent award years. Applicable Processing Edits will be modified to accommodate Iraq and Afghanistan Service Grants submitted with DRI = ‘true’ and the newly calculated Sequester-Limited Scheduled Award Amount. In award years prior to the 2017-2018 Award Year, Iraq and Afghanistan Service Grants submitted with actual disbursements will continue to be rejected.

For more information on submitting Iraq and Afghanistan Service Grant actual disbursements in the 2017-2018 Award Year and forward, refer to the business rules for Pell Grant actual disbursements in the topic entitled Submitting Pell Grant Disbursement Information and the Disbursement Release Indicator.
Please see Volume 2, Section 4 for detailed information on the changes to the Processing Edits.

NOTE: Prior to June 2018, the COD System would not allow an actual disbursement to be submitted on an Iraq and Afghanistan Service Grant award in any award year. In award years prior to the 2017-2018 Award Year, Iraq and Afghanistan Service Grants submitted with actual FMS Outgoing test file disbursement (DRI = true) submitted on a Pell Grant award with the “IAS Grant” indicator equal to “true” will continue to be rejected with Edit 194.

Updating Iraq & Afghanistan Service Grant Awards

The COD System will allow the “IAS Grant” indicator to be updated with change records. The COD Web site will validate the “IAS Grant” indicator and the student’s Iraq and Afghanistan Service Grant eligibility when a CPS Transaction Number change is made. The COD Web site will prevent an authorized user from submitting an update to an existing award unless the Iraq and Afghanistan Service Grant criteria are satisfied.

Business Rules

1. When updating an existing award with “IAS Grant” indicator set to “true”, the “IAS Grant” indicator will only be displayed as editable if a CPS Transaction Number change is made.

2. When updating an existing award with “IAS Grant” indicator set to “false”, the “IAS Grant” indicator will only be displayed if a CPS Transaction Number change is made and the Iraq and Afghanistan Service Grant eligibility criteria is satisfied (Pell Eligible Flag = “false” and DoD Match Flag = “true”) on the CPS record.

3. If an “IAS Grant” indicator is changed from “false” to “true” or “true” to “false” the SFPG will be recalculated.

   a. If the IAS Grant Indicator is changed from “false” to “true”, essentially changing the award from a Pell Grant to an Iraq and Afghanistan Service Grant, the COD System will check to see if any funded disbursements exist for that award. If the Pell Grant award has a funded disbursement, the COD System will reject the Pell Grant award with Award Level Edit 193. If no Pell Grant funded disbursements exist, the COD System will allow the change from ‘false’ to ‘true’ and the SFPG will be recalculated.

   b. If the IAS Grant Indicator is changed from “true” to “false”, essentially changing the award from an Iraq and Afghanistan Service Grant to a Pell Grant, the COD System will check to see if any funded disbursements exist for that award. If the Iraq and Afghanistan Service Grant award has a funded disbursement, the COD
System will reject the Iraq and Afghanistan Service Grant award with Award Level Edit 193. If no Iraq and Afghanistan Service Grant funded disbursements exist, the COD System will allow the change from ‘true’ to ‘false’ and the SFPG will be recalculated.

4. Award Level Warning Edit 192 will be returned on any Pell Grant award record submitted with the “IAS Grant” indicator equal to “true”.

5. The COD System will create an Event when the “IAS Grant” indicator is successfully updated. The Event will be displayed on the COD Web site.

6. The COD System will not calculate an Administrative Cost Allowance (ACA) for the Iraq and Afghanistan Service Grants.

**Iraq and Afghanistan Service Grant Sequester-Limited Scheduled Award Amount**

Due to the Budget Control Act of 2011, all Iraq and Afghanistan Service Grants submitted by schools are subject to sequester-required reductions. These sequester-required reductions, determined by the first disbursement date, are applied to the SFPG associated to an Iraq and Afghanistan Service Grant for a student in a specified award year. The COD System will calculate the Iraq and Afghanistan Service Grants Sequester-Limited Scheduled Award Amount using the Pell Grant Payment Schedule or Cost of Attendance (COA) of the school, less the applicable sequester-required reduction amount for the Iraq and Afghanistan Service Grant.

In order to calculate the Iraq and Afghanistan Service Grant Sequester-Limited Scheduled Award Amount, the COD System will first calculate the Iraq and Afghanistan Service Grants Scheduled Federal Pell Grant (SFPG) as the lesser of the following two amounts:

1. The maximum SFPG per the Pell Grant Payment Schedule for the applicable award year

   OR

2. The COA submitted in the `<AttendanceCost>` tag of the Common Record

The maximum SFPG will be determined by the COD System per the full-time Pell Grant Payment Schedule for the submitted Iraq and Afghanistan Service Grant’s award year. Once the Iraq and Afghanistan Service Grant’s SFPG is determined, the COD System will then calculate the Sequester-Limited Scheduled Award Amount for an Iraq and Afghanistan Service Grant using the following formula:

**Sequester-Limited Scheduled Award Amount**

Sequester-Limited Scheduled Award Amount = SFPG – the sequester-required reduction amount
**Processing System-Generated Iraq and Afghanistan Service Grant Negative Disbursement Responses**

COD system-generated Iraq and Afghanistan Service Grant responses of Document Type ND (Negative Disbursement) are generated for several situations for Award Years 2017-2018 and forward, including Negative Pending records, Potential Overaward Process (POP), and Iraq and Afghanistan Service Grant LEU deobligation reductions. Note that there are no schema changes for Iraq and Afghanistan Service Grant response, therefore they will continue to be reported under the <Pell> award block.

**Business Rules**

1. A response document of Document Type ND contains a system-generated Document ID.

2. The response indicates the Disbursement Number to which the downward adjustment applies and a COD system-generated Disbursement Sequence Number between 66 and 90.

3. The response contains the `<PreviousSequenceNumber>` indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

4. The response will contain Edit 192 in the `<ResponseCode>` to indicate the award is an Iraq and Afghanistan Service Grant.

**Iraq and Afghanistan Service Grant Negative Pending Records**

If an update to an Iraq and Afghanistan Service Grant Award’s information, for Award Years 2017-2018 and forward, produces an Award Amount less than the total of all accepted and posted Disbursement Amounts for that award, the COD System creates a Negative Pending Record for that award. The response contains the Warning Edit 040 and the Negative Pending Amount tag.

For business rules on negative pending records, please refer to the Pell Grant Negative Pending section.

**Iraq and Afghanistan Service Grant Concurrent Enrollment**

A student may not receive an Iraq and Afghanistan Service Grant at two or more schools concurrently. When more than one Attended School reports Iraq and Afghanistan Service Grant disbursements, in Award Years 2017-2018 and forward, for a student and the enrollment dates are within 30 calendar days of each other, the COD System identifies a
potential concurrent enrollment and sends a warning message to all schools involved.

**Business Rules**

1. A student may not receive an Iraq and Afghanistan Service Grant at two or more schools concurrently.

2. When the COD System receives Iraq and Afghanistan Service Grant disbursement information for a student from more than one Attended School for the same award year, the COD System checks whether the enrollment dates are within 30 calendar days of each other.

3. If a concurrent enrollment situation exists, the COD System sends the school that submitted the Iraq and Afghanistan Service Grant disbursement information Warning Edit 069 on their response document.

4. The COD System sends the school that submitted the Iraq and Afghanistan Service Grant disbursement information and all other schools with accepted disbursement information in COD for the student and that award year, an Iraq and Afghanistan Service Grant Multiple Reporting Record (MRR).

**Deobligation due to Iraq and Afghanistan Service Grant LEU Exceeding 600%**

Similar to the Pell Grant program, a student’s Iraq and Afghanistan Service Grant LEU may not exceed 600%. As a part of regular disbursement processing, the COD system will reject disbursements in Award Years 2017-2018 and forward which cause the student’s Iraq and Afghanistan Service Grant LEU to exceed 600%.

If a student’s Iraq and Afghanistan Service Grant LEU increases due to changes to a student’s Cost of Attendance, that student’s disbursements may exceed the award amount, and may be eligible for reduction as a part of the Iraq and Afghanistan Service Grant LEU deobligation process.

**Business Rules**

1. Iraq and Afghanistan Service Grant LEU deobligation will only occur for disbursements in Award Years 2017-2018 and forward.

2. If a recipient’s Iraq and Afghanistan Service Grant LEU exceeds 600% without disbursement information being submitted to COD, the Iraq and Afghanistan Service Grant may be included as part of the Iraq and Afghanistan Service Grant LEU deobligation process.

3. Iraq and Afghanistan Service Grants will be reduced 30 days after the Iraq and Afghanistan Service Grant LEU exceeded 600%.
4. Iraq and Afghanistan Service Grant Disbursements will be reduced so that the Iraq and Afghanistan Service Grant LEU does not exceed 600%.

5. The reduced Iraq and Afghanistan Service Grant disbursement’s sequence number will be 66 if that is the first system generated negative disbursement for that disbursement. If that disbursement has been reduced as a part of a negative disbursement due to other deobligation processes, the sequence number will be incremented by one.

6. The COD System will send a system-generated negative disbursement response to the reporting school’s TG mailbox when a disbursement has been reduced as a part of the Iraq and Afghanistan Service Grant LEU deobligation process.

7. The updated reduced Iraq and Afghanistan Service Grant LEU will be included in the ND response.

8. The ND response will contain Edit 192 in the <ResponseCode> to indicate the award is an Iraq and Afghanistan Service Grant.

9. The associated school’s Iraq and Afghanistan Service Grant CFL will be reduced to NAPD the day after the Iraq and Afghanistan Service Grant LEU deobligation reduction if Iraq and Afghanistan Service Grant CFL equaled NAPD prior to the reduction.

**Iraq and Afghanistan Service Grant Potential Overaward Process (POP)**

Similar to the Pell Grant program, a student may receive Iraq and Afghanistan Service Grant disbursements from more than one Attended School during the course of an award year. When more than one Attended School reports Iraq and Afghanistan Service Grant disbursements for a student, the COD System checks to make sure that the student has not received:

a. An Iraq and Afghanistan Service Grant TEU greater than 100% less the applicable sequester-required reduction percentage for that award year and the AEI is not set to “true” for any awards with funded disbursements greater than $0 in that award year.

   **OR**

b. An Iraq and Afghanistan Service Grant TEU of greater than 150% less the applicable sequester-required reduction percentage for that award year and the AEI is set to “true” for at least one award with funded disbursements greater than $0 in that award year.

Section 34CFR 690.65 of the regulations provides the basis for determining a student’s remaining eligibility when another school has
Implementation Guide

dispursed Pell Grant funds to the student. These same regulations will now apply to schools that have disbursed Iraq and Afghanistan Service Grants in Award Years 2017-2018 and forward:

- Calculate the percentage of Iraq and Afghanistan Service Grant EU at each previous school by dividing the disbursements to the student at the school by the SFPG at that specific school;

- Calculate the percentage of Iraq and Afghanistan Service Grant TEU for the award year by adding the Iraq and Afghanistan Service Grant EU for all schools the student previously attended;

- Calculate the Remaining Iraq and Afghanistan Service Grant Eligibility when the AEI is:
  
  o **Not set** to “true” in that award year, subtract the Iraq and Afghanistan Service Grant TEU from the sum of (100% less the applicable sequester-required reduction percentage for that award year)

  **OR**

  o **Set** to “true” in that award year, subtract the Iraq and Afghanistan Service Grant TEU from the sum of (150% less the applicable sequester-required reduction percentage for that award year).

- The remaining Iraq and Afghanistan Service Grant eligibility is the percentage of the Iraq and Afghanistan Service Grant Sequester-Limited Scheduled Award Amount at the new school to which the student is entitled.

If the COD System receives Iraq and Afghanistan Service Grant disbursement information that places the student in a situation where he/she has received more than 100% (or 150% if AEI is set to “true”) of their Iraq and Afghanistan Service Grant SFPG less the applicable sequester-required reduction percentage, the student has entered an Iraq and Afghanistan Service Grant Potential Overaward Process (POP) situation. In an Iraq and Afghanistan Service Grant POP situation, the COD System accepts the Iraq and Afghanistan Service Grant disbursement information and notifies all schools involved that the POP situation must be resolved within 30 calendar days. If after 30 calendar days the situation has not been resolved, the COD System generates a Negative Disbursement for all the student’s Iraq and Afghanistan Service Grant disbursements at all schools for that award year. The eligible schools are then required to re-report accurate disbursement records to reinstate the student’s Iraq and Afghanistan Service Grant disbursements.

**Business Rules**

1. Iraq and Afghanistan Service Grant POP situations will only apply to Iraq and Afghanistan Service Grants in Award Years 2017-2018 and forward.

2. A student may not receive more than 100% of their SFPG less the applicable sequester-required reduction percentage for the
award year when the student does not have AEI set to “true” for any Iraq and Afghanistan Service Grant awards with net funded disbursements greater than $0 and in that award year.

3. A student may not receive more than 150% of their SFPG less the applicable sequester-required reduction percentage for the award year when the student has AEI set to “true” for at least one Iraq and Afghanistan Service Grant award with net funded disbursements greater than $0 and in that award year.

4. A school to which a student transfers must determine the student’s Iraq and Afghanistan Service Grant TEU, considering Iraq and Afghanistan Service Grant disbursements made and the Iraq and Afghanistan Service Grant Sequester-Limited Scheduled Award Amount at each school the student previously attended in the award year.

5. When the COD System receives Iraq and Afghanistan Service Grant disbursement information for a student from more than one Attended School for the same award year, the COD System checks whether the student has received more than 100% (or 150% if AEI is set to “true”) of their total Iraq and Afghanistan Service Grant SFPG less the applicable sequester-required reduction percentage for the award year.

6. If an Iraq and Afghanistan Service Grant POP situation exists, the COD System sends the school that submitted the Iraq and Afghanistan Service Grant Disbursement Information a Response document containing:

   a. Warning Edit 068 (POP - Notice Sent Separately)
   b. FSA Code value of PO (PO = Iraq and Afghanistan Service Grant POP)
   c. Iraq and Afghanistan Service Grant Total Eligibility Used (TEU) value greater than:
      
      i. 100% less the applicable sequester-required reduction percentage for the award year when the student does not have AEI set to “true” any awards with net funded disbursements greater than $0 and in that award year.
      
      ii. 150% less the applicable sequester-required reduction percentage for the award year when the student has AEI set to “true” for at least one award with net funded disbursements greater than $0 and in that award year.

7. The COD System sends the school that submitted the Iraq and Afghanistan Service Grant Disbursement Information and all other schools with accepted and posted Iraq and Afghanistan Service Grant Disbursement Information in the COD System for
that student and that award year an Iraq and Afghanistan Service Grant Multiple Reporting Record (MRR).

8. The COD System sends a weekly Pell POP Report to schools that will include Iraq and Afghanistan Service Grant POP situations for Award Years 2017-2018 and forward, beginning in June 2018.

9. The COD System allows an Iraq and Afghanistan Service Grant POP situation to exist for 30 calendar days from the date the student entered the Iraq and Afghanistan Service Grant POP situation (defined as the date the Iraq and Afghanistan Service Grant MRR for the POP situation is created).

10. During the 30-day period, each school involved in the Iraq and Afghanistan Service Grant POP situation must review the student’s Iraq and Afghanistan Service Grant award and disbursements and apply the proper eligibility calculation.

11. During that 30-day period, the COD System can accept and post further Iraq and Afghanistan Service Grant disbursements that decrease or increase the student’s year-to-date Iraq and Afghanistan Service Grant disbursement amount.

12. The COD System accepts Iraq and Afghanistan Service Grant Disbursement Information from no more than 3 schools for a student in a POP situation.

13. If the student remains in an Iraq and Afghanistan Service Grant POP situation after 30 calendar days, the COD System reduces all accepted and posted Iraq and Afghanistan Service Grant disbursements to zero ($0.00) for that student and that award year at all schools involved.

14. Each school that correctly paid the student Iraq and Afghanistan Service Grant funds must re-report the student’s Iraq and Afghanistan Service Grant Disbursement Information to the COD System.

15. During the Iraq and Afghanistan Service Grant POP situation, the COD School Relations Center will take a proactive role in contacting the schools.

16. The COD System does not prevent the same schools from creating another Iraq and Afghanistan Service Grant POP situation for the same student.

17. COD School Relations will escalate the issue should the same schools create another Iraq and Afghanistan Service Grant POP situation involving the same student.

18. Students will be removed from Iraq and Afghanistan Service Grant POP status within 30 days from the date the student was
initially placed in the POP based on either of the following conditions:

a. The student’s Iraq and Afghanistan Service Grant TEU becomes 100% less the applicable sequester-required reduction percentage for the award year or below based on downward Iraq and Afghanistan Service Grant disbursement adjustments submitted by the schools and the student does not have an AEI of “true” for any Iraq and Afghanistan Service Grant award with net funded disbursements greater than $0, at a school within that award year.

b. A school submits a maintenance record with an AEI of “true” for any Iraq and Afghanistan Service Grant award with net funded disbursements greater than $0, at a school within that award year, and the student’s Iraq and Afghanistan Service Grant TEU becomes 150% less the applicable sequester-required reduction percentage for the award year or below.

19. The COD System will send a system-generated negative disbursement response to the reporting school’s TG mailbox when a disbursement has been reduced as a part of the Iraq and Afghanistan Service Grant POP deobligation process.

20. The updated reduced Iraq and Afghanistan Service Grant TEU will be included in the ND response.

21. The ND response will contain Edit 192 in the <ResponseCode> to indicate the award is an Iraq and Afghanistan Service Grant.

**Iraq and Afghanistan Service Grant Lifetime Eligibility Used**

Iraq and Afghanistan Service Grant Lifetime Eligibility Used (LEU) is the sum of all Iraq and Afghanistan Service Grant Eligibility Used (EU) for all years since the 2010-2011 Award Year. The Iraq and Afghanistan Service Grant LEU limit of 600% applies to all Iraq and Afghanistan Service Grant recipients for all award years. These calculations are made real time and displayed on the COD Web Site.

Beginning in June 2018, the COD System began returning a rejecting edit (Edit 201) if an Iraq and Afghanistan Service Grant disbursement causes a recipient to exceed the Iraq and Afghanistan Service Grant LEU limit of 600%. The edit will apply to Iraq and Afghanistan Service Grants submitted in Award Years 2017-2018 and forward.

**Iraq and Afghanistan Service Grant Lifetime Eligibility Used Calculation**

Iraq and Afghanistan Service Grant LEU % = Sum of ALL Iraq and Afghanistan Service Grant EU’s for all award years since the 2010-2011 Award Year
Business Rules

1. Beginning in June 2018, Iraq and Afghanistan Service Grant LEU is calculated for all Iraq and Afghanistan Service Grant recipients.

2. Beginning in June 2018, the newly calculated Iraq and Afghanistan Service Grant LEU is returned on Common Record responses to schools. Note that prior the June 2018, the Pell Grant LEU was returned on Common Record responses for Iraq and Afghanistan Service Grants.

3. COD returns the `<LifetimeEligibilityUsed>` tag in the Common Record Response for Iraq and Afghanistan Service Grant Awards for the 2017-2018 Award Year and forward.

4. Two existing warning level edits will inform schools when students are nearing or have exceeded their Iraq and Afghanistan Service Grant LEU.

5. Beginning with the 2017-2018 Award Year and forward, COD includes Iraq and Afghanistan Service Grant LEU in the system generated Negative Disbursement responses for Iraq and Afghanistan Service Grants.

6. For the 2017-2018 Award Year and forward Iraq and Afghanistan Service Grant disbursements which cause the Iraq and Afghanistan Service Grant LEU to exceed 600% will be rejected with Edit 201.

7. A recipient’s Iraq and Afghanistan Service Grant LEU may exceed 600% by changing the Cost of Attendance (COA).
   
a. If a recipient’s Iraq and Afghanistan Service Grant LEU exceeds 600% due to a change to the SFPG for the Iraq and Afghanistan Service Grant, the Iraq and Afghanistan Service Grant may be included as a part of the Iraq and Afghanistan Service Grant LEU deobligation process. Please refer to the Deobligation Due to Iraq and Afghanistan Service Grant LEU Exceeding 600% section within the Implementation Guide of the Technical Reference.

Academic Competitiveness Grant (ACG)

ACG is not applicable for the 2011 – 2012 Award Year and forward. Please reference prior award year Technical Reference Documentation for information on ACG. Beginning in March 2016, the COD system will no longer support processing of ACG records.

National Science and Mathematics Access to Retain Talent (SMART)

SMART is not applicable for the 2011 – 2012 Award Year and forward. Please reference prior award year Technical Reference Documentation
for information on SMART awards. Beginning in March 2016, the COD system will no longer support processing of SMART records.

Teacher Education Assistance for College and Higher Education (TEACH) Award and Disbursement Process

Overview

Through the College Cost Reduction and Access Act of 2007, Congress created the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program that provides grants of up to $4,000 per year to students who intend to teach in a public or private elementary or secondary school that serves students from low-income families. Eligible undergraduate and post-baccalaureate students may receive up to an aggregate limit of $16,000 and graduate students may receive up to a graduate aggregate limit of $8,000 in TEACH Grants.

In exchange for receiving a TEACH Grant, students must agree to serve as a full-time teacher in a high-need field in a public or private elementary or secondary school that serves low-income students. Recipients must teach for at least four academic years within eight calendar years of completing the program of study for which they received a TEACH Grant. If they don’t complete this service obligation, all amounts of TEACH Grants received will be converted to a Federal Direct Unsubsidized Stafford Loan and interest charged from the date the grant(s) was disbursed.

School Eligibility

COD will process TEACH Grant awards and disbursements submitted by TEACH Program Eligible Schools. The COD System verifies the attending school is eligible for the TEACH Program before processing a TEACH Grant record.

Business Rules

1. If a school loses eligibility for the TEACH Program, it also loses eligibility for the TEACH Grant program. However, if a school loses eligibility for the TEACH Grant program it does not affect eligibility for other TEACH Programs.

2. Reporting/Attending relationships are at the program level and schools reporting TEACH Grants for other schools must be identified within COD as their reporting school. If the reporting school identified in the common record doesn’t have a reporting relationship with the attended school, COD will reject the records with (Edit 002, 100).

3. Attending schools can only submit TEACH Grant awards through reporting schools to which they have a valid
relationship. COD rejects the TEACH Grant award if the attending school Routing ID has no established relationship to the Routing ID in the reporting school complex element (Edit 034).

4. If an attending school is eligible for the TEACH Grant program and the reporting school is ineligible for the TEACH Grant program, COD accepts and processes the record and returns warning edit (Edit 101).

5. Attending schools must be a main location. COD rejects the TEACH Grant award if the attending school in the award block is not a main location (Edit 166). Schools will not be allowed to report records with an additional location identified as the attending school.
   a. A main location is defined as a school with an OPEID with zeroes located in the first, seventh, and eighth positions.

Student Eligibility
A student’s eligibility for the TEACH Grant program will be determined by the school. To be eligible for a TEACH Grant award, the student must:

1. Complete the Free Application for Federal Student Aid (FAFSA®), although you do not have to demonstrate financial need.

2. Be a U.S. Citizen or eligible non-citizen.

3. Be enrolled as an undergraduate, post-baccalaureate, or graduate student in a postsecondary educational institution that has chosen to participate in the TEACH Grant Program.

4. Be enrolled in coursework that is necessary to begin a career in teaching or plan to complete such coursework. Such coursework may include subject area courses (e.g., math courses for a student who intends to be a math teacher).

5. Meet certain academic achievement requirements (generally, scoring above the 75th percentile on a college admissions test or maintaining a cumulative GPA of at least 3.25) OR be a current teacher or retired expert in a Teacher Shortage Area.

6. Sign a TEACH Grant Agreement to Serve.

7. Complete the yearly counseling requirement.

TEACH Grant Data Will Not Be Corrected
Unlike the Pell Grant program, the COD System does not provide an option for the processing of TEACH Grant data that allows schools to
choose if they want to accept corrections to TEACH Grant data they submit to the COD System. As such, TEACH Grant data that fails edits are rejected.

**Reporting Pennies in the Award and Disbursement Amount Data Elements**

The Award and Disbursement Amounts on the Common Record may include pennies. In the TEACH Grant Program, pennies can be reported as partial dollars or two zeroes.

**Business Rules**

1. The data elements for Award and Disbursement Amounts on the Common Record may include two digits to the right of a decimal point.

2. When the reported amount does not include a decimal point, the COD System infers a decimal point and two zeroes to the right of the last digit reported. For example, if a school reports 1000, the COD System infers a decimal and two zeroes and stores as 1000.00.

3. In the TEACH Grant Program, schools may report partial dollars (500.32) OR zeroes in the last two digits (500.00) for Award Amount and Disbursement Amount

OR

4. Report the whole dollar amount only (500) and the COD System infers the decimal point and two zeroes and stores as (500.00).

5. The Award and Disbursement Amount data elements are:
   a. **Award Amount**, <FinancialAwardAmount>
   b. **Disbursement Amount**, <DisbursementAmount>

6. When performing edits on the Award Amount, COD calculates the TEACH Grant Award Amount using the data provided by the school. If the COD calculated Award Amount contains partial dollar amounts, COD rounds up this Award Amount to the next whole dollar amount. This is the COD calculated Award Amount. COD compares the COD calculated Award Amount to the Award Amount <FinancialAwardAmount> reported by the school.
   
   a. If the school reported Award Amount is less than or equal to the COD calculated Award Amount, COD accepts the Award Amount.
   b. If the school reported Award Amount is greater than the COD calculated Award Amount, COD rejects the school reported Award Amount

**Example**
When reporting an amount of $2625.34:

1. Include the decimal point and two digits to the right:
   \[ 2625.34 \]

   OR

2. Include the decimal point and two zeroes to the right:
   \[ 2625.00 \]

   OR

3. Omit the decimal point and report the whole dollar amount only:
   \[ 2625 \]

   Then, the COD System infers a decimal point and two zeroes and stores \[ 2625.00 \].

Do not submit \[ 262500 \] as the COD System infers a decimal and stores this submission as \[ 262500.00 \].

**Creating Financial Award ID and Financial Award Number**

The Financial Award ID and Financial Award Number are used to uniquely identify a TEACH Grant Award.

**Financial Award ID**

- The Financial Award ID is a unique identifier that helps distinguish all awards

- Elements of the Financial Award ID (21 characters)
  - Current SSN
  - Award Type (H=TEACH Grant)
  - Award Year (21)
  - First six digits of the OPEID (Attended School)
  - Award Sequence Number

The Pell program is award year specific and only allows one award for a student at a school per award year. In the TEACH Grant program, a student may have more than one award in a single award year. A school could submit two TEACH Grant awards with the same student level for a student in the same common record document provided the Award IDs are unique.

Unlike Pell, schools must submit a Financial Award ID and Financial Award Number to establish a TEACH Grant award. (See *Common Record Layout* for details.).
Establishing TEACH Grant Award Information

Award information submitted to the COD System for a student from a specific Attended School applies to the entire award year for that student.

Disbursement information is required when creating all initial TEACH Grants on the web or by Common Record submission to the COD System.

Business Rules

1. The first submission of Award information that is accepted by the COD System establishes the TEACH Grant award for the student for that Attended School Routing ID and award year.

2. A TEACH Grant Award cannot be originated with an award amount equal to zero (Edit 042).

3. A school may originate more than one TEACH award for the same student within an award year, across schools or at a single school.

4. The Award amount for a single Award cannot exceed $4,000 (Edit 162).

5. The cumulative award amount for all TEACH Grant awards across all schools, across all grade levels, cannot exceed the maximum of $8000 for a single award year (Edit 163).

6. Student level code can span multiple award years.

7. The sum of the disbursement amounts must equal the award amount in order to originate the TEACH Grant award.

8. The following fields must be populated with a valid value in order to create an TEACH Grant award:

   a. Student SSN
   b. Date of Birth
   c. Last Name
   d. Financial Award Type
   e. Financial Award Year
   f. Financial Award Number
   g. Financial Award Amount
   h. CPS Transaction Number
   i. Enrollment Date
   j. Financial Award ID
k. Student Level Code

9. A complete address is required to establish a TEACH Grant award. However, these tags are not required to be submitted on the incoming record if it can be pulled from the CPS or the COD database.

   a. Complete address
      i. The data elements for a complete address are:
         1. Address Line &lt;AddressLine&gt;
         2. City, &lt;City&gt;
         3. State/Province Code
            a. For domestic addresses
               &lt;StateProvinceCode&gt;
         4. Postal Code, &lt;PostalCode&gt;
         5. Country Code, &lt;CountryCode&gt;
            (international addresses only)
      b. If any of the address fields are blank, COD will attempt to pull all address data elements from CPS or the COD database.
      c. The COD System will pull the student address for the highest CPS transaction number for the most recent award year.
      d. If a complete address cannot be found on CPS, COD database, or input file, the Person and Award record will reject (Edit 021).
         i. The school must resubmit the record with a complete address.
      e. If a complete address is found on CPS or the COD database, the record will accept and the school will receive a warning message that a complete address exists on COD (Edit 120).

10. An eligible Citizenship Status is required to originate a TEACH award on COD.
   a. For TEACH awards, the valid values for Citizenship Status Code are 1 (US Citizen) and 2 (Eligible Non-Citizen). If an invalid value is submitted, COD will reject the origination.
   b. If a Citizenship Status Code is provided in the common record, COD will accept and store a valid value.
c. If a Citizenship Status Code is not provided in the common record, COD will attempt to pull the value from CPS.

   i. If a valid value cannot be pulled from CPS, COD will reject the origination.

11. Schools must report the same Award Type in the Award ID as the Award Type submitted in the Award Block (Edit 035).

12. Schools must report the same award year in the Award ID as listed in the Award Information Block (Edit 035).

13. The COD System does not allow duplicate TEACH Grant Award IDs on the system (Edit 033).

14. The COD System does not allow schools to originate a TEACH Grant award or adjust a TEACH Grant award amount if the Received Date is after the Latest Date to Accept a Common Record, unless the school has been granted extended processing.

15. Setting the optional Teacher Expert Indicator, `<TeacherExpertIndicator>`, to `true` indicates that a graduate student is either a current teacher or a retired expert in a Teacher Shortage Area.

   a. If the `TeacherExpertIndicator` is set to `true` with the Student Level Code not equal to 6 or 7, the COD system will reject the record (Edit 164).

   b. The value of the Teacher Expert Indicator does not affect the maximum Grant Amount.

16. The COD System will not allow schools to report a different Award Type in the Award ID than the Award Type in the Award Block. If a school submits a TEACH Grant record that reports the Award Type in the Award ID as not equal to H, COD will reject the record and return an edit to the school (Edit 035). Conversely, COD will reject the record if the Award Type in the Award ID is H and the program is not TEACH Grant.

17. The COD System will not allow schools to report a different award year in the Award ID than the award year listed in the Award Information Block. If a school submits a TEACH Grant record that reports the award year of the Award ID as different from the award year indicated in the Award Information Block, COD will reject the record and return an edit to the school (Edit 035).

18. The COD system will verify the first six digits of the OPEID submitted in the Award ID match the first six digits of the OPEID of the Attended School. If the six
digit OPEID populated in the Award ID does not match the first six digits of the OPEID of the attended school referenced by Routing ID in the common record, COD will reject the record and return an edit to the school.

19. The COD System will not allow duplicate TEACH Grant Award IDs on the system. If a school submits a TEACH Grant origination and the TEACH Grant Award ID is already established under a different student than the one on the incoming TEACH record, COD will reject the award origination and return a reject edit to the school (Edit 033). If a school submits a TEACH award and the TEACH Award ID is already established under the same student, but with a different award number than the one on the incoming TEACH record, COD will reject the award origination and return a reject edit to the school.

20. The COD System will reject a TEACH Grant award record if the Award Identifiers (Attended Routing ID, award year, and Award Number) already exist for this student and the school is trying to change the Award ID (Edit 033).

21. If an award rejects when establishing an initial TEACH Grant, the award will not be linked to a TEACH Agreement to Serve.

22. The COD System requires submission of all disbursement information when establishing a TEACH award via the common record or COD Web site. This data is used when producing the TEACH disclosure statement.

23. The following disbursement level data elements are required for establishing a TEACH Award:

   a. For TEACH actual disbursements (DRI is true), the COD System requires the following disbursement level fields:

      i. **Disbursement Number**, <DisbursementNumber>

      ii. **Disbursement Amount** <DisbursementAmount>

      iii. **Disbursement Sequence Number**, <DisbursementSequenceNumber>

      iv. **Disbursement Date**, <DisbursementDate>

      v. **Disbursement Release Indicator** is true,<DisbursementReleaseIndicator>true</DisbursementReleaseIndicator>

      vi. **Published Program Length Years** <PublishedPgmLengthYears>

      vii. **Published Program Length Months** <PublishedPgmLengthMonths>
viii. Published Program Length Weeks
   <PublishedPgmLengthWeeks>

ix. Weeks Programs Academic Year
   <WeeksProgramsAcademicYear>

x. Special Programs
   <SpecialPrograms>

xi. Program Credential Level
   <ProgramCredentialLevel>

xii. Enrollment Status <EnrollmentStatus>

xiii. Program CIP Code <ProgramCIPCode>

xiv. Program CIP Code Year
   <ProgramCIPCodeYear>

xv. Payment Period Start Date
   <PaymentPeriodStartDate>

Note: Payment Period Start Date is only required if there was a period of ineligibility at the school.

b. For TEACH anticipated disbursements (DRI is false), the COD System requires the following disbursement level fields:

   i. Disbursement Number, <DisbursementNumber/>

   ii. Disbursement Amount, <DisbursementAmount>

   iii. Disbursement Sequence Number,
       <DisbursementSequenceNumber>

   iv. Disbursement Date, <DisbursementDate>

   v. Disbursement Release Indicator is false,
      <DisbursementReleaseIndicator>false</DisbursementReleaseIndicator>

   vi. Enrollment Status <EnrollmentStatus>

   vii. Program CIP Code <ProgramCIPCode>

   viii. Program CIP Code Year
      <ProgramCIPCodeYear>

   ix. Published Program Length Years
      <PublishedPgmLengthYears>

   x. Published Program Length Months
      <PublishedPgmLengthMonths>

   xi. Published Program Length Weeks
      <PublishedPgmLengthWeeks>
xii. Weeks Programs Academic Year
  <WeeksProgramsAcademicYear>

xiii. Special Programs
  <SpecialPrograms>

xiv. Program Credential Level
  <ProgramCredentialLevel>

xv. Payment Period Start Date
  <PaymentPeriodStartDate>

Note: Payment Period Start Date is only required if there was a period of ineligibility at the school.

- 1: Undergraduate certificate or diploma program
- 2: Associate’s degree
- 3: Bachelor’s degree
- 4: Post Baccalaureate certificate
- 5: Master’s degree
- 6: Doctoral degree
- 7: First Professional degree
- 8: Graduate/Professional certificate
- 99: Non-credential programs (preparatory coursework/teacher certification)

24. The COD system shall validate the Student Level against the Program Credential Level value on all incoming TEACH Records. If an invalid combination is submitted, the system will reject with Edit 208. Valid combinations are included below:

<table>
<thead>
<tr>
<th>Description</th>
<th>Program Credential Level</th>
<th>Student Level Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undergraduate certificate or diploma program</td>
<td>1</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Associate’s degree</td>
<td>2</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Bachelor’s degree</td>
<td>3</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Post Baccalaureate certificate</td>
<td>4</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Master’s degree</td>
<td>5</td>
<td>0-7 (Undergraduate &amp; Graduate)</td>
</tr>
<tr>
<td>Doctoral degree</td>
<td>6</td>
<td>0-7 (Undergraduate &amp; Graduate)</td>
</tr>
</tbody>
</table>
20. The `<PublishedProgramLengthYears>`, `<PublishedProgramLengthMonths>`, and `<PublishedProgramLengthWeeks>` tags are only valid for the 2017-2018 Award Year and forward. The COD System shall validate that only one of the three tags `<PublishedProgramLengthYears>`, `<PublishedProgramLengthMonths>`, or `<PublishedProgramLengthWeeks>` is submitted on an incoming record. If more than one is submitted, the system will reject with edit 202.

21. The Week Program Academic Year

   `<WeeksProgramsAcademicYear>` tag is only valid for the 2017-2018 Award Year and forward. The COD System shall validate the `<WeeksProgramsAcademicYear>` tag when submitted:

   i. The Weeks Programs Academic Year is the Title IV Academic Year and must be greater than or equal to 26. The COD system will reject the record with edit 209 if the Weeks Programs Academic Year is less than 26.

   ii. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag must be submitted when `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` is submitted, or the `<SpecialPrograms>` is set to "Preparatory Coursework Graduate Professional Program."

   iii. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag will be ignored if submitted with the `<PublishedPgmLengthYears>` and will not be stored.

   iv. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag is optional when submitting changes to a disbursement.

   v. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag must be submitted when changing the Special Program to ‘Preparatory Coursework Graduate Professional Program’ or submitting `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` when `<PublishedPgmLengthYears>` was previously submitted for the disbursement.
22. The Special Programs `<SpecialPrograms>` is only valid for the 2017-2018 Award Year and forward. If the tag is submitted it must include one of the following valid values for Special Programs:

1. ‘A’ – Selective Admission Associated Program
2. ‘B’ – Bachelor’s Degree Completion Program
3. ‘N’ – Not Applicable
4. ‘P’ – Preparatory Coursework Graduate Professional Program
5. ‘T’ – Non-Credential Teacher Certification Program
6. ‘U’ – Preparatory Coursework Undergraduate Program

25. The COD system shall validate the `<SpecialPrograms>` tag in conjunction with the Grade Level field on all TEACH records. If the Grade Level / Special Programs combination is not valid, the system will reject with edit 203. Valid combinations are included below.

Note: For all 2017-2018 awards and forward, the Special Programs tag is a disbursement level field. This may result in disbursements for a single TEACH award to have different Special Programs values. The COD System will determine whether Undergraduate Subsidized usage or Non-Credential Teacher Certification usage is calculated based on other relevant disbursement data; the usage for that award will continue to only apply to one subsidized usage category.

<table>
<thead>
<tr>
<th>Special Program</th>
<th>Value</th>
<th>Valid Grade Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selective Admission Associated Program</td>
<td>A</td>
<td>0-5</td>
</tr>
<tr>
<td>Bachelor’s Degree Completion Program</td>
<td>B</td>
<td>0-5</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Preparatory Coursework Graduate Professional Program</td>
<td>P</td>
<td>5</td>
</tr>
<tr>
<td>Non-Credential Teacher Certification</td>
<td>T</td>
<td>5</td>
</tr>
<tr>
<td>Preparatory Coursework Undergraduate Program</td>
<td>U</td>
<td>1, 0</td>
</tr>
<tr>
<td>Tag Not Submitted</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

23. The COD system will require the Enrollment Status and CIP code on TEACH Disbursements.
24. Enrollment Status <EnrollmentStatus> must equal the enrollment status of the student at the time of disbursement or if the disbursement is outside the loan period, the enrollment status of the student at the beginning of the payment period for which the disbursement is intended.

xiv. The valid values for <EnrollmentStatus> are:
1. ‘F’ - Full Time = 1.00
2. ‘Q’ - Three-quarters Time = 0.75
3. ‘H’ - Half Time = 0.50
4. ‘L’ - Less than half time

xv. Enrollment Status <EnrollmentStatus> is optional when submitting changes to disbursements and should only be resubmitted if the original submission was incorrect.

25. The Program CIP Code<ProgramCIPCode> is required on TEACH Disbursements.

xvi. The valid CIP codes can be found at the following location: http://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55

xvii. The COD System will reject an invalid CIP Code with edit 204.

xviii. A valid <ProgramCIPCode> must be submitted with a disbursement upon origination.

26. The Program CIP Code Year<ProgramCIPCodeYear> is required on TEACH Disbursements.

xix. The COD System will reject an invalid CIP Code Year with edit 204.

xx. A valid <ProgramCIPCodeYear> must be submitted with a disbursement upon origination.

26. The COD System compares the sum of the disbursements (anticipated and/or actual to the Award Amount

a. If the sum of the disbursements does not equal the Award Amount, the award rejects with error code 160.

Updating and Adjusting TEACH Grant Awards

Business Rules

1. The following fields are required for making TEACH Grant award adjustments:

   a. Financial Award Type
   b. Financial Award Year
   c. Financial Award Number
   d. Financial Award Amount
   e. Financial Award ID
2. The COD System does not accept a change record with an award amount that is less than the sum of accepted funded disbursements (Edit 041).

3. The COD System will allow a change to the Student Level Code of an existing award
   a. If the Teacher Expert Indicator is set to true and the new student level code is less than 6, the change will reject (Edit 164)

4. The COD system will allow changes to the award amount.
   a. If the change submitted will result in an award amount greater than $4000, the change will reject.
   b. If the change submitted will result in an award amount less than the sum of the actual disbursements (DRI= true) for the award, the change will be rejected.

**Disbursement Sequence Number Required on all Disbursements**

A Disbursement Sequence Number must be reported for all disbursements. This is an indicator of a single transaction associated with a specific disbursement number.

**Business Rules**

1. The Disbursement Sequence Number determines the order in which the transaction must be processed for a given Disbursement Number.

2. The Disbursement Sequence Number must be reported in an incremental, ascending order.

3. The Disbursement Sequence Number valid values range from 1-99.
   a. Disbursement Sequence Numbers 1-65 are reported by schools.
   b. Disbursement Sequence Numbers 66-90 are reserved for COD system-generated adjustments to actual disbursements and actual disbursement information submitted online via the COD Web site.
   c. Disbursement Sequence Numbers 91-99 are reserved.

4. The Disbursement Sequence Number must be reported as “01” when the Disbursement Release Indicator is set to false.

5. When resubmitting a disbursement transaction that was rejected, the resubmission must use the same
Disbursement Sequence Number that was rejected, unless the record was rejected for incorrect sequence number.

6. The COD System will allow a change to the Student Level Code of an existing award
   a. If the Teacher Expert Indicator is set to true and the new student level code is less than 6, the change will reject (Edit 164)

7. The COD system will allow changes to the award amount.
   a. If the change submitted will result in an award amount greater than $4000, the change will reject.
   b. If the change submitted will result in an award amount less than the sum of the actual disbursements (DRI = true) for the award, the change will be rejected.

**Submitting TEACH Grant Disbursement Information and Disbursement Release Indicator**

The COD System can accept TEACH Grant Disbursement information in advance of, on, or after the disbursement date.

**Business Rules**

1. Disbursement Date is defined as the date the disbursement should be funded.

2. The COD System must accept an Award Amount greater than zero ($0) before it can accept Disbursement information for that student.

3. TEACH Grant Award or Disbursement Amounts cannot equal zero on the first submission.

4. Disbursement Date may range from 2020-10-01 (October 1, 2020) to 2022-09-30 (September 30, 2022).

5. The COD System accepts Disbursement information for anticipated disbursements (DRI = false) and actual disbursements (DRI = true).
   a. The required disbursement data elements to process an anticipated TEACH Grant disbursement are:
      i. Disbursement Number, <DisbursementNumber>
      ii. Disbursement Amount, <DisbursementAmount>
      iii. Disbursement Date, <DisbursementDate>
      iv. Disbursement Release Indicator set to false, <DisbursementReleaseIndicator>false</DisbursementReleaseIndicator>

The earliest date on which an institution may disburse a TEACH Grant, either with Federal funds or its own funds, is the date of the publication of the Pell Payment and Disbursement Schedules (TBA) for the 2021-2022 Award Year.
v. Disbursement Sequence Number,  
   &lt;DisbursementSequenceNumber&gt;

vi. Enrollment Status &lt;EnrollmentStatus&gt;

vii. Program CIP Code &lt;ProgramCIPCode&gt;

viii. Program CIP Code Year  
    &lt;ProgramCIPCodeYear&gt;

b. The required disbursement data elements to process an actual TEACH Grant disbursement are:

i. Disbursement Number, &lt;DisbursementNumber= " ">

ii. Disbursement Amount, &lt;DisbursementAmount&gt;

iii. Disbursement Date, &lt;DisbursementDate&gt;

iv. Disbursement Release Indicator set to true,  
    &lt;DisbursementReleaseIndicator&gt;true&lt;/DisbursementReleaseIndicator&gt;

v. Disbursement Sequence Number,  
    &lt;DisbursementSequenceNumber&gt;

vi. Enrollment Status &lt;EnrollmentStatus&gt;

vii. Program CIP Code &lt;ProgramCIPCode&gt;

viii. Program CIP Code Year  
    &lt;ProgramCIPCodeYear&gt;

6. An active Agreement must be linked on the COD system before the COD system will accept actual disbursements (DRI =true)

   a. The COD system will return a disbursement level reject edit if an actual disbursement (DRI =true) is submitted and the TEACH award it is associated with is not linked to an active Agreement on the COD System for that award year.

   b. The COD system will accept anticipated disbursements (DRI =false) even if an active Agreement is not on the COD System.

7. When reporting a disbursement adjustment to the COD System, the new Disbursement Amounts must be reported rather than the amount of the reduction or increase to the existing Disbursement Amount.

8. Depending on the funding method employed by the school, the COD System may accept Disbursement
information in advance of, on, or after the disbursement date.

a. Schools designated as Advance Funded may submit a Disbursement Release Indicator set to `true` up to seven (7) calendar days before the Disbursement Date.

   i. If the current date is more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to `true`, the COD System rejects the disbursement with (Edit 51).

   ii. If the current date is not more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to `true`, the COD System accepts and posts the disbursement.

b. Schools placed on Cash Monitoring 1 (HCM1) review status by the School Participation Team may submit a Disbursement Release Indicator set to `true` up to 7 calendar days before the disbursement date.

   i. If the current date is more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to `true`, the COD System rejects the disbursement with (Edit 51).

   ii. If the current date is not more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to `true`, the COD System accepts and posts the disbursement.

c. Schools designated as in the Reimbursement or Cash Monitoring 2 (HCM2) review status can submit a Disbursement Release Indicator set to `true` if the current date is equal to or after the Disbursement Date.

   i. If the current date is before the Disbursement Date and the Disbursement Release Indicator is set to `true`, the COD System rejects the disbursement with (Edit 51).

   1. If the current date is equal to or after the Disbursement Date and the Disbursement Release Indicator is set to `true`, the COD System accepts and posts the disbursement upon review of documentation by the School Participation Team.
9. The COD rejects an actual disbursement amount if the sum of the student’s disbursements exceeds the award amount for that award.

**Updating and Adjusting TEACH Grant Disbursement Amounts and Dates**

Disbursement Amounts and Dates must be changed using the same disbursement number, rather than reporting a new disbursement number.

**Business Rules**

1. To change a Disbursement Amount and/or Disbursement Date, the following data elements are required:

   a. **Disbursement Release Indicator**, 
      <DisbursementReleaseIndicator>
   b. **Disbursement Number**, <Disbursement Number= "">
   c. **Disbursement Sequence Number**, 
      <DisbursementSequenceNumber>
   d. **Disbursement Amount**, <DisbursementAmount>
   e. **Disbursement Date**, <DisbursementDate>
   f. **Enrollment Status** <EnrollmentStatus>
   g. **Program CIP Code** <ProgramCIPCode>
   h. **Program CIP Code Year** <ProgramCIPCodeYear>

2. When changing a disbursement already reported to COD, the same Disbursement Number must be reported.

   a. When changing a disbursement with a Disbursement Release Indicator = false, the Disbursement Sequence Number must be set to “1.”

3. When changing a disbursement that already has a Disbursement Release Indicator = true, the Disbursement Sequence Number must be unique. The next sequential Disbursement Sequence Number must be reported.

   a. Disbursement Sequence Numbers for a specific Disbursement Number must be used in sequential order within the range of 1-65.

4. When changing the Disbursement Amount, the new Disbursement Amounts must be reported, rather than an adjustment to the existing Disbursement Amount.

5. Disbursement Date is always the date the cash was credited to the student’s account or paid to the student directly for this specific Disbursement Number (Disbursement Sequence Number = 1). Disbursement

---

**Schools cannot report a negative disbursement amount on a Common Record document. A replacement disbursement amount MUST be reported.**
Date is NOT the transaction date of the adjustment to the disbursement (Disbursement Sequence Number not equal to 1).

6. Schools must submit adjustments to actual disbursements (Disbursement Sequence Number not equal to 1) within 15 days of the date the school becomes aware of the need to adjust a student’s previously reported disbursement.

7. TEACH Grant disbursement amounts can be adjusted to $0.

8. Disbursement dates and disbursement amounts cannot be changed on the same transaction.
Teacher Education Assistance for College and Higher Education (TEACH) Grant Program Agreement

**TEACH Grant Initial and Subsequent Counseling**

Students will be able to complete a TEACH Grant Initial and Subsequent Counseling session on the StudentAid.gov Web site.

**Business Rules for TEACH Grant Initial and Subsequent Counseling**

1. Students must complete TEACH Grant Initial and Subsequent Counseling before they can sign their Agreement.

2. TEACH Grant Initial and Subsequent Counseling must be completed by the student each year that they receive a TEACH Grant award.

**Example**

Below is a sample TEACH Grant Initial and Subsequent Counseling Response:

```
O*N05TG01005 ,CLS=CRAC22OP,XXX,BAT=0000000000000000002018-01-28T22:29:51.0100000001,
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <CreatedDateTime>2018-01-28T11:45:53.11</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000124</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>P</FullResponseCode>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>10000124</RoutingID>
    <AttendedSchool>
      <RoutingID>10000124</RoutingID>
      <Student>
        <Index>
          <SSN>888123456</SSN>
          <BirthDate>1969-05-14</BirthDate>
          <LastName>DEER</LastName>
        </Index>
        <Name>
          <FirstName>STAN</FirstName>
        </Name>
      </Student>
    </AttendedSchool>
  </ReportingSchool>
</CommonRecord>
```
TEACH Agreement

The Agreement is the approved promissory note for TEACH grants for all schools. The Agreement can only be submitted electronically via the StudentAid.gov Web site.

Business Rules for All Agreement

1. An Agreement must be signed by the student before a school can disburse a TEACH grant.
   
   a. An Agreement must be accepted on the COD System in order to allow actual disbursements to be accepted.

2. When students complete an Agreement, an Agreement Response is sent to the school the student selected while completing the Agreement.

Linking an Agreement to a TEACH Award

The COD System links TEACH awards to an active Agreement for that Student.

Business Rules
1. The COD System does not link an Agreement to an award if the award amount and all actual and anticipated disbursements equal zero.

2. The COD System initiates an Agreement linking process when an award amount on an unlinked award is increased from zero.

3. The COD System links an accepted TEACH grant to a valid Agreement using ALL of the following student data elements:
   a. Current SSN
   b. Current Date of Birth
   c. First Two Character of the First name
      i. If the TEACH grant exists on COD with no first name, then the first two characters of the last name
   d. Award Year

4. When a TEACH grant is accepted and a valid Agreement is already on file, the Agreement and grant are linked.
   a. The Agreement to Serve Status Code, Agreement To Serve Link Indicator, Agreement To Serve ID, and Electronic Agreement To Serve Indicator are generated on an Award Response.

5. When a TEACH grant is accepted and no valid Agreement is on file, the award is not linked and the Agreement To Serve Status Code on the Award Response equals ‘R’ (Rejected Agreement or valid Agreement not on file at COD).

6. When a TEACH grant is NOT accepted and there is a valid Agreement on file, the grant will not be linked to the Agreement. The Agreement To Serve Link Indicator (which equals false) and the appropriate Agreement To Serve Status Code (P = Pending or R = Rejected) will be returned in the Award Response.

7. When an Agreement is received and an accepted TEACH grant is already on file and not yet linked to an Agreement, the Agreement and the grant are linked.
   a. The Agreement to Serve Status Code, Agreement To Serve Link Indicator, Agreement To Serve ID, and Electronic Agreement To Serve Indicator are returned on an Agreement Acknowledgement for the TEACH Grant.

Schools should encourage students to list the same identifier information (i.e. complete formal name) used to file the FAFSA® on applications for all types of financial aid. An accepted award and valid Agreement will not link if the identifier information differs on the award and Agreement.
8. When an Agreement is received and does not link to an accepted TEACH grant, the Agreement is not linked and an Agreement Acknowledgement is generated.

9. If a valid Agreement is on file and an accepted TEACH grant does not link (Agreement Status Code = P, Pending), the student identifier information on the award does not match the student identifier information on the Agreement. See EXAMPLE below. Schools should compare the student identifier information listed on the award and Agreement, and perform the following actions:

   a. Update the student identifier information listed on the award origination via batch or web.

   b. Inactivate the award by reducing the award amount and all anticipated disbursements to zero ($0.00). Originate a new award with student identifier information that matches that of the Agreement.

**Example**

Student Robert Adams files a FAFSA® using his given name. The student identifier information Robert lists on the FAFSA® is pulled from CPS to create a valid Agreement. The student identifier information on the Agreement is as follows:

```xml
<Student>
  <Index>
    <SSN>999931101</SSN>
    <BirthDate>1987-04-15</BirthDate>
    <LastName>ADAMS</LastName>
  </Index>
  <Name>
    <FirstName>ROBERT</FirstName>
    <LastName>ADAMS</LastName>
  </Name>
</Student>
```

Robert then applies for a TEACH grant using his common first name, Bob. The student identifier information on the award is as follows:

```xml
<Student>
  <Index>
    <SSN>999931101</SSN>
    <BirthDate>1987-04-15</BirthDate>
    <LastName>ADAMS</LastName>
  </Index>
  <Name>
    <FirstName>BOB</FirstName>
    <LastName>ADAMS</LastName>
  </Name>
</Student>
```

The COD System attempts to match the student identifier information contained on the award with the student identifier information of a valid Agreement on file at COD. Since the first two letters of the student’s first name listed on the award do not match the first two letters of the student’s first name listed on the Agreement, the award and Agreement do not link. The COD System is unable to find the appropriate Agreement with which to link the award, and returns the Agreement Status Code of R (Rejected) on the Award Response.
Generating an Agreement Acknowledgement

An Agreement Acknowledgement is generated by COD and sent to a school to provide the status of an Agreement.

The COD System sends Agreement Acknowledgements to the school associated with the Agreement.

Business Rules

1. Agreement Acknowledgements are sent to the Attended school.

2. Agreement Acknowledgements won’t be sent to a school under the following conditions:
   a. The awards(s) from that school linked to the Agreement has (have) been reduced to $0.
   b. The school has confirmed that it has completed processing (confirmed closeout) for the TEACH Grant award year indicated on the Agreement or in the award record(s) from that school and the school has no award linked to that Agreement in a year that is still “open.”
   c. FSA has confirmed that the school has completed processing (confirmed closeout for the school) for the TEACH Grant award year indicated on the Agreement or in the award record(s) from that school and the school has no award linked to that Agreement in a year that is still “open.”
   d. The date is beyond the annual processing deadline (closeout deadline) for the TEACH Grant award year indicated on the Agreement or in the award record(s) from that school and the school isn’t on Extended Processing and the school has no award linked to that Agreement in a year that is still “open.” The TEACH data submission deadline is the last processing date of September following the end of the award year (i.e. for 2021-2022 the closeout deadline would be September 30, 2022).

3. Schools will receive Agreement Acknowledgements when the conditions above don’t exist and:
   a. COD accepts an Agreement and there are no existing awards.
   b. COD accepts an Agreement and at least one award exists. The award(s) and Agreement link.
   c. COD accepts an award and the Agreement exists. The award and the Agreement link.
   i. The Agreement Acknowledgement is sent to the school where the award originated.
d. The Agreement Acknowledgement will be sent to all schools associated with the Agreement that have active awards (Award Amount and Disbursement Amounts > $0) or were listed on the Agreement.

   i. If the school specified on the Agreement is the same as the school where an active award originated, the school will not receive a separate acknowledgement.

   ii. Agreement Acknowledgement sent to schools that do not have an award linked to their Agreement, but the Agreement is linked to an award from another school, will not receive the <AgreementToServeLinkIndicator> tag.

e. Award (active or inactive) and Agreement exist on COD System and are unlinked. The Agreement and award are manually linked.

   i. The Agreement Acknowledgement will be sent to the school where the award was originated.

f. Award and Agreement exists on COD System and are unlinked. Agreement and award are linked through SSIM.

   i. The Agreement Acknowledgement will be sent to the school where the award was originated.

4. A COD system-generated Agreement Acknowledgement contains a Document Type of AT. The Document Type indicates the type of Response.

5. A Response Document of Document Type AT contains a system-generated Document ID.

6. An Agreement Acknowledgement contains the following data elements in the Response complex element <Response>:


   b. Document Type, <DocumentTypeCode>

   c. Processing Date, <ProcessDate>

7. The following data elements are in all Agreement Acknowledgements:

   a. Agreement Status, <AgreementToServeStatusCode>

   b. Agreement Link Indicator, <AgreementToServeLinkIndicator>

   c. Agreement ID, <AgreementToServeID>
d. Electronic Agreement Indicator
   <ElectronicAgreementToServeIndicator>

8. A Pending Agreement is an accepted Agreement, which cannot yet be linked with an award record. (No accepted Origination record on file.)

9. Agreement Acknowledgements are sent for discharge reversals.

**Examples**

Below is a sample Agreement Response:

```xml
O*N05TG00790 ,CLS=CRAT220P,XXX,BAT=0000000000000000002017-07-10T17:28:14.0000000001,  
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"  
xmlns:xsd="http://www.w3.org/2001/XMLSchema"  
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"  
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">  
  <TransmissionData>  
    <CreatedDateTime>2017-07-10T09:09:09.00</CreatedDateTime>  
    <Source>  
      <COD>  
        <RoutingID>00000001</RoutingID>  
      </COD>  
    </Source>  
    <Destination>  
      <School>  
        <RoutingID>00000632</RoutingID>  
      </School>  
    </Destination>  
    <FullResponseCode>F</FullResponseCode>  
  </TransmissionData>  
  <ReportingSchool>  
    <RoutingID>00000632</RoutingID>  
    <AttendedSchool>  
      <RoutingID>00000632</RoutingID>  
    </AttendedSchool>  
    <Student>  
      <Index>  
        <SSN>123456789</SSN>  
        <BirthDate>1973-01-01</BirthDate>  
        <LastName>SMITH</LastName>  
      </Index>  
      <TEACH>  
        <FinancialAwardYear>2022</FinancialAwardYear>  
        <FinancialAwardID>123456789H22123456001</FinancialAwardID>  
        <Response>  
          <ResponseCode>A</ResponseCode>  
          <ElectronicAgreementToServeIndicator>true</ElectronicAgreementToServeIndicator>  
          <AgreementToServeID>123456789C18012345001</AgreementToServeID>  
          <AgreementToServeStatusCode>A</AgreementToServeStatusCode>  
          <AgreementToServeLinkIndicator>true</AgreementToServeLinkIndicator>  
        </Response>  
      </TEACH>  
    </Student>  
  </ReportingSchool>  
</CommonRecord>
```
Below is a sample Linked Agreement Acknowledgement:

```
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <CreatedDateTime>2018-03-13T17:30:11.09</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
    <Destination>
      <School>
        <RoutingID>10000790</RoutingID>
      </School>
    </Destination>
    <FullResponseCode>F</FullResponseCode>
  </TransmissionData>
  <ReportingSchool>
    <RoutingID>10000790</RoutingID>
  </ReportingSchool>
  <AttendedSchool>
    <RoutingID>10000790</RoutingID>
  </AttendedSchool>
  <Student>
    <Index>
      <SSN>999922192</SSN>
    </Index>
  </Student>
</CommonRecord>
```
Below is a sample Unlinked Agreement Acknowledgement:

```xml
<?xml version="1.0" encoding="UTF-8"?>
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2020/v4.0e"
               xmlns:xsd="http://www.w3.org/2001/XMLSchema"
               xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
               xmlns:cod="http://www.ed.gov/FSA/COD/2020/v4.0e">
  <TransmissionData>
    <CreatedDateTime>2018-03-19T20:19:25.72</CreatedDateTime>
    <Source>
      <COD>
        <RoutingID>00000001</RoutingID>
      </COD>
    </Source>
  </TransmissionData>
</CommonRecord>
```
**TEACH Grant Closeout**

The COD System provides the ability for schools to perform end of program year closeout activities for Award Year 2016-2017 and forward.

The TEACH data submission deadline is the last processing date of September following the end of the award year (i.e. for 2021-2022 the closeout deadline would be September 30, 2022). This is the last processing day of the program year, so all school data must be received and accepted by this date in order to be included in a school's final Ending Cash Balance for the year.

**Business Rules**

1. When a school’s internal ending cash balance and unbooked balances are $0, it is in agreement with the ending cash balance reflected in the school’s most recent TEACH Grant School Account Statement (SAS) for the award year, and the school has no outstanding issues for this program year, the school should complete the Program Year Closeout Balance Confirmation Form in COD Web. Once the school has successfully confirmed closeout the following actions will occur:

   a. The Department will send a Program Year Closeout letter to the school’s President and Financial Aid Director.
   b. COD will reject award or disbursement changes per published edits.
   c. The Department will reduce the school's Current Funding Level (CFL) to the greater of Net Drawdowns or Net Accepted & Posted Disbursements.
   d. The SAS report for this award year and program will no longer be sent.

**NOTE:** If the school should need to submit data for this award year at a future time they can request to be reopened or placed on extended processing via the Request Reopen/Extended Processing page in COD.

2. COD will send out the following correspondence:

   a. **Balance Notification Letter:** Sent to schools as a reminder to finish processing and confirm closeout before the established data submission deadline.
   b. **Program Year Closeout Letter:** Sent to schools once they have completed the Balance Confirmation process and are considered closed out for the requested program and award year. This includes completing the Balance Confirmation Page in COD Web and verifying their ending cash balance and unbooked loans balances haven’t changed.
c. **Reopen Change Letter Reopen Change Letter:**
   Sent to schools to notify them that they are no longer considered confirmed closed out for the award year because:
   
   v. The school’s balances in the Common Origination and Disbursement (COD) System have changed and/or
   
   vi. Staff at school has requested to be reopened to continue processing via the Request Reopen/Extended Processing page on the COD Web site

d. **Extended Processing Letter** – Sent to schools that have been approved for an extension to the data submission deadline. Notifies the school of the expiration date of that extension.

**NOTE:** Schools can find a HTML copy of the above correspondence on the School Correspondence page via the COD Web site.

---

**User Readiness Checklist**

1. Obtain your Routing Number (formerly Common School Identifier) from COD School Relations or the COD Web site.

2. Communicate your Routing Number to your software vendor, third-party servicer, or state agency, as needed.

3. Contact COD Customer Service or review the COD Web site to verify that your Reporting, Attending, and Funding School Relationships are set in COD accurately.

4. Contact COD Customer Service or review the COD Web site to verify that the Funding Method for your school is set in COD accurately.

5. Reference Volume II of the COD Technical Reference for information on how to modify school or software provider applications to create Common Record files in XML format.


7. Obtain a COD School Administrator User ID for the COD Web site. (Reference the “COD User ID Setup for Web site” announcement on Knowledge Center for more information).
8. Establish User IDs within your organization for access to the COD Web site (to be completed by the organization’s Security Administrator).

9. Establish Rules of Behavior documents related to use of the COD System

10. Access the COD Web site to:
    a. Update your School Processing Options, as needed.
    b. Review COD Processing Updates.
    c. Review COD FAQs.
    d. Review COD Web Messages.
    e. Ensure your school contact information is accurate.

If your school’s contact information needs to be updated, please contact COD School Relations for assistance.
School Processing Options

School Processing Options are parameters or criteria that are set by the school and dictate how the COD System processes school data. Schools must confirm that these school processing options are set appropriately for each award year prior to submitting data for that award year to COD for processing.

Any questions related to the following school processing options should be directed to the COD School Relations Center at the following phone number or email address:

- (800) 848 - 0978
- CODSupport@ed.gov

Promissory Note Type Option

This option determines whether the single-year or multi-year feature is applied to a Promissory Note for each award year. Schools eligible to use the multi-year feature can choose to issue single-year or multi-year promissory notes.

Business Rules

1. This option applies to Direct Loan schools only.

2. The values for this option are “single-year” or “multi-year.”

3. “Single-year” signifies the borrower must submit a promissory note for each academic year for that specific school.

4. “Multi-Year” signifies the school may allow the borrower to receive loans for subsequent academic years based on a previously signed MPN.

5. All schools are now eligible for the MY feature.

6. New schools to the Direct Loan program will be defaulted to use the MY feature in the COD system.

7. Direct Loan schools may update this option by contacting COD Customer Service.

For more information regarding eligibility for the MY MPN feature see the Dear Colleague Letter GEN-02-10 (November 2002) and DLB-03-02.

Entrance Counseling Participation Option

Schools have the option to participate in the Direct Loan Entrance Counseling process via the StudentAid.gov Web site.

Note: Entrance Counseling has been available to borrowers on StudentAid.gov since March 2010. This option will allow schools to determine if their school will participate in the Entrance Counseling option available on StudentAid.gov

Business Rules
1. The Entrance Counseling Participation Option is NOT award year specific.

2. Schools may update this option by visiting the School Options page on the COD Web site.

3. This option applies to Direct Loan schools only.

4. The valid values for the Participate in the Entrance Counseling Participation Option are ‘Y’ or ‘N’.

5. ‘Y’ signifies that schools will participate in the Entrance Counseling process.

6. ‘N’ signifies that schools will not participate in the Entrance Counseling process.

**Entrance Counseling Response Option**

Beginning in March 2013, schools will have the option to determine the frequency of how often they receive Entrance Counseling System Generated Responses

**Business Rules**

1. Schools may update this option by visiting the School Options page on the COD Web site.

2. This option applies to Direct Loan schools only.

3. If a school has elected not to participate in electronic Entrance Counseling, that school will not be able to select an Entrance Counseling response frequency.

4. The valid values for Response Frequency are ‘On-Demand’ or ‘Daily’
   a. ‘On-Demand’ signifies that the school will request their Exit Counseling responses via the COD Web site
   b. ‘Daily’ signifies that the school will receive their Exit Counseling responses daily

**Exit Counseling Response Option**

Beginning in March 2013, schools will have the option to determine the frequency of how often they receive Exit Counseling System Generated Responses

**Business Rules**
1. Schools may update this option by visiting the School Options page on the COD Web site.

2. This option applies to Direct Loan schools only.

3. The valid values for Response Frequency are ‘On-Demand’ or ‘Daily’
   a. ‘On-Demand’ signified that the school will request their Exit Counseling responses via the COD Web site
   b. ‘Daily’ signifies that the school will receive their Exit Counseling responses daily

---

**Financial Awareness Counseling Response Option**

Beginning in June 2012, schools will have the option to determine their Financial Awareness Counseling Response frequency

**Business Rules**

1. Schools may update this option by visiting the School Options page on the COD Web site.

2. This option applies to Direct Loan schools only.

3. The valid values for Response Frequency are ‘On-Demand’ or ‘Daily’
   a. ‘On-Demand’ signifies that the school will request their responses via the COD Web site
   b. ‘Daily’ signifies that the school will receive responses daily

---

**StudentAid.gov Associated States Option**

Schools have the option to select under which states their school name will appear on all StudentAid.gov process in which the school participates.

**Business Rules**

1. The Associated States Option is NOT award year specific.

2. Schools may update this option by visiting the Schools Option page on the COD Web site.

3. This option applies to Direct Loan schools only.

4. Schools must be associated with a minimum of one state.

5. Additional location schools will not be able to select multiple states. Additional location schools will inherit
their associated state from the main address of the additional location school.

**StudentAid.gov School Name Display Option**

Schools have the option to modify how their school name is displayed as a part of the StudentAid.gov processes.

**Business Rules**

1. The School Name Display Option is NOT award year specific.
2. Schools can update this option by visiting the School Options page on the COD Web site.
3. The modified school name will apply to all StudentAid.gov processes.
4. This option applies to Direct Loan Schools only.

**StudentAid.gov PLUS Application Award Range Option**

Beginning in July 2011 and forward, schools will have the option to input default Award Range which borrowers will select as part of the PLUS Loan Request Process.

**Business Rules**

1. The PLUS Application Participation Option(s) is award year specific.
2. Schools can enter/update the Award Range begin and end dates by visiting the School Options page on the COD Web site.
3. The value will be defaulted to the first day of the month. For example, if August 2012 to July 2013 is selected as the date range, the award request range will be stored into the COD system as August 1, 2012 to July 1, 2013.
4. Schools may enter up to 4 Award Range Begin and End Dates.
5. Schools will have the option to have a value of ‘Other’ displayed to borrowers completing a PLUS Application for their school.
6. If a school has selected not to have ‘Other’ as a valid award range for their school, then at least one valid award range must be entered.
7. This option applies to Direct Loan Schools only.
**PLUS Application Participation Option**

This processing option determines if a school will participate in the PLUS Application Process. Schools can also determine their PLUS Application participation begin date.

**Business Rules**

1. The PLUS Application Participation Option(s) is award year specific.

2. This option applies to Direct Loan Schools only.

3. The valid values for the Participate in the PLUS Application are ‘Y’ or ‘N’

4. ‘Y’ signifies that schools will participate in the PLUS Application process.

5. ‘N’ signifies that schools will not participate in the PLUS Application process

6. Schools can select their PLUS Application Participation Begin Date and End Dates. NOTE: The COD System will increment the PLUS Application Begin Date and End Dates by one year with the implementation of a new award year.

7. If a school selects a PLUS Application Participation Begin date which is in the future, users will not be able to complete a PLUS Application for that school via StudentAid.gov

8. Schools may select different options for the Parent PLUS Application and the Grad PLUS Application.

9. Direct Loan schools may update this option via the School Options page on the COD Web site.

**PLUS Application Acknowledgement Option**

This processing option determines how often a school will receive PLUS Application Acknowledgements. Schools that do not participate in the PLUS Application process will not receive PLUS Application Acknowledgements.

**Business Rules**

1. The PLUS Application Acknowledgement Option is award year specific.

2. This option applies to Direct Loan schools only.

3. The values for this option are “daily” or “on demand.”

4. “Daily” signifies schools will receive PLUS Application Acknowledgements on a daily basis.
5. “On Demand” signifies that schools will be required to visit the ‘PLUS Application Response Request’ page on the COD Web site to request their PLUS Application Acknowledgements be sent to them.

6. New schools to the Direct Loan program will be defaulted to the ‘daily’ option.

7. Direct Loan schools may update this option via the School Options page on the COD Web site.

Disclosure Statement Print Option

This processing option determines whether the school prints its own disclosure statements or allows the COD System to generate the Disclosure Statement upon receipt of the required information for each award year.

Business Rules

1. This option applies to Direct Loan schools only.

2. The Disclosure Statement Print Code tag on the Origination Record and Common Record allows a school to decide at the individual student loan level who is responsible to print the disclosure statement for a specific loan and overrides the selected school option.

3. The Disclosure Statement Print Code tag can also be used to request the COD System to reprint a disclosure statement.

4. If an award does not contain the Disclosure Statement Print Code, the COD System defaults to the option on the school profile when processing the award.

5. Direct Loan schools may update this option at any time on the COD Web site.

6. The values for this option are Y or N.

   Y Signifies that COD prints.

   N Signifies that school prints.

Administrative Cost Allowance Option

This processing option determines whether or not the school will receive the Pell Administrative Costs Allowance (ACA) for each award year.

Business Rules

1. This option applies to Pell Grant Schools only.

2. The values for this option are Y or N.

   Y Signifies that the school will receive the ACA.

   N Signifies that the school will not receive the ACA.

3. Pell Grant schools may contact COD School Relations to request that FSA updates this option.
**Pell Grant Error Processing Option**

This processing option determines whether the COD System rejects or corrects certain Pell Grant data elements that do not pass edits.

**Business Rules**

1. This option applies to Pell Grant Schools only.
2. The values for this option are *Rejected* or *Corrected*.
3. *Rejected* signifies that the COD System will reject certain Pell Grant data elements that do not pass edits.
4. *Corrected* signifies that the COD System will correct certain Pell Grant data elements that do not pass edits.
5. The default for this option is *Corrected*.
6. Pell Grant schools may contact COD School Relations to request that FSA updates this option.

**NOTE:** The program options on School Options Information page for Pell will continue to drive the processing options for Iraq and Afghanistan Service Grant except for Error Processing Options. Iraq and Afghanistan Service Grant Error Processing Options will be defaulted to ‘Rejected’ for all schools.

**Full or Standard Response**

This processing option determines whether the COD System returns to the school a Full or Standard Response to Common Records processed by the COD System.

**Business Rules**

1. A Full Response contains all the original tags sent by the School and the rejected data elements and reason codes.
2. A Standard Response contains only the rejected data elements and reason codes.
3. This option defaults to a Standard Response.
4. Schools can override this option on a record-by-record basis by submitting the `<FullResponseCode>` tag on the Common Record.
5. If the `<FullResponseCode>` tag is not sent, the option defaults to Standard Response.

**Response Records Generated Based on Web Activities**

This processing option determines whether the COD System sends Response Documents to the school’s SAIG mailbox based on activity performed on the COD Web site. This activity includes processing a
new student, award or disbursement, or a change to any of these on the COD Web site.

**Business Rules**

1. The values for this option are N or Y.

2. Y signifies that the COD System will send a Response Document to the school’s SAIG mailbox based on activity performed on the COD Web site.

3. N signifies that the COD System will not send a Response Document to the school’s SAIG mailbox based on activity performed on the COD Web site.

4. The default for this option is N.

5. Schools may update this option at any time on the COD Web site.

6. If the school selects to receive a Response Document for activity performed on the COD Web site, the Document Type is WB indicating a web-initiated response.

7. The `<DisbursementSequenceNumber>` is 66-90 for the Response with a Document Type of WB.

8. The `<PreviousSequenceNumber>` tag is returned on the Response with a Document Type of WB to indicate the previous accepted Disbursement Sequence Number on the COD system for this Disbursement Number.

**Common Record Response Document Length Option**

Schools have the option to receive Response Documents with one tag set per line or a specified maximum number of bytes per line up to 9,999 bytes.

**Business Rules**

1. The default for this option is one tag set per line.

2. Schools may choose to change the default to a specified maximum number of bytes per line, up to 9,999 bytes per line.

   a. The minimum allowed bytes per line is the length of the longest tag in the Common Record XML Schema.

3. Schools must contact COD School Relations to request that this option be updated.