

## **Frequently Asked Questions (FAQs) about Direct Loan Closeout for 2017–18 Program Year Attachment to February 2019 Electronic Announcement**

### **Q1: When should a school confirm close out for the 2017–18 Program Year?**

**A1:** A school should be able to confirm close out within a month or two of submitting its final actual disbursements, but no later than the established data submission (closeout) deadline of July 31, 2019. If your school will need to process actual disbursement data after the established processing closeout deadline (refer to Q7 for more information).

**Note:** As a reminder, cash management, disbursement reporting (including adjustments to disbursements), Subsidized Usage Limit Applies (SULA) updates, and monthly reconciliation requirements supersede the closeout deadline. If a school is meeting these regulatory requirements, a school should be able to reconcile to a zero Ending Cash Balance soon after its final disbursements, and if all processing is completed and all known issues have been resolved, the school should confirm closeout at that time. Schools should **not** wait until the closeout deadline.

### **Q2: When a school successfully completes the school balance confirmation process and closes out a Direct Loan Award Year in the COD System, are there subsequent actions that occur?**

**A2:** Yes. Based on a school's successful balance confirmation for a Direct Loan Award Year, the following actions will occur:

1. The Department of Education (the Department) will send a Program Year Closeout letter to the school's President and Financial Aid Administrator (FAA).
2. The COD System will reject award or disbursement changes per published edits.
3. The Department will reduce the school's Current Funding Level (CFL) to the greater of Net Drawdowns or Net Accepted & Posted Disbursements.
4. 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.
5. The School Account Statement (SAS) and other reports for this award year and program will no longer be sent.

### **Q3: Can a school delay closeout activities based on the possibility of future processing needs?**

**A3:** Schools should not delay closeout activities based on transactions that could need to occur at a later date. If a school has completed all known cash and disbursement activity in the award year, the school must complete their reconciliation to a zero Ending Cash Balance and confirm closeout, as indicated in Q1.

Delays should only occur if a school has specifically identified additional transactions needing to be reported or corrected immediately. These may include, but are not limited to the following:

- Eligible late disbursements
- Downward disbursement adjustments due to changes in student enrollment or eligibility
- Unclaimed credit balances needing to be refunded

These changes should be reported in a timely manner, per regulatory requirements, and then final reconciliation and closeout should be completed.

**Q4: What are the benefits to confirming closeout within a month or two of submitting final disbursement data?**

**A4:** The benefits to confirming closeout include:

- Receiving a Program Year Closeout Letter to include with your final reconciliation documentation. This letter confirms the date your school officially closed out the award year.
- Tighter controls over available funds in G5. With the closeout confirmation process, a school's CFL is reduced to the greater of Net Drawdowns or Net Accepted and Posted Disbursement which prevents further funds being requested or received for the closed year. This also prevents funds from being accidentally drawn in the wrong award year when a new award year is added.
- No additional monthly reconciliation to the SAS, unless your school's disbursement or cash balances change (see Q9 for more details).
- Changes to cash balances after a school has confirmed closeout (i.e. refund of cash or a drawdown adjustment) will trigger a Reopen Change Letter via email which notifies the school that a change in balance has occurred and the balance needs to be researched and resolved. This aids schools in monitoring when changes occur late in the award year so reconciliation efforts can resume and school can reconfirm closeout.
- Tighter controls over submitting disbursement or award level changes per published edits. Confirming closeout allows schools the ability to review changes to disbursement and award data more closely prior to requesting to be reopened or placed on extended processing.
  - A Reopen Change or Extended Processing Letter will be sent via email to the President and FAA as notification that your school was reopened or placed on extended processing due to a request made by your school or by a change in balance. If one of these emails are received your school is no longer considered confirmed closed out and it indicates your school must resume reconciliation and reconfirm closeout.

**Note:** Any change in balance requires a school to complete an additional reconciliation to fulfill its monthly reconciliation requirements.

- Discontinues a year specific report which reduces clutter in SAIG mailbox and student data from being sent unnecessarily.

**Q5: How does a school close out the Direct Loan Program Year?**

**A5:** Once a school completes a final reconciliation of its internal Financial Aid and Business Office records to its Direct Loan SAS reflecting a zero Ending Cash Balance, the school must go to the COD Web site and complete the School Balance Confirmation form (found under the "School" link in the

blue tool bar along the top of the main page and the “Balance Confirmation” link on the left-hand side under School Information).

**Note:** Prior to program year close out, schools should ensure that fields related to Subsidized Usage Limit Applies (SULA) are updated appropriately. See Q6 for more detail on this issue.

**Q6: What steps should a school complete prior to closeout to ensure subsidized usage limit calculations will be correct?**

**A6:** Ensure that:

- Any pending disbursements have been reduced to zero.
- All loan amounts reflect the gross amount of the total disbursed to students.
- The loan period dates (<FinancialAwardBeginDate> and <FinancialAwardEndDate>) include only those payment periods for which the student received and retained an actual disbursement.
- The academic year dates (<AcademicYearBeginDate> and <AcademicYearEndDate>) reflect the defined length of program’s academic year. Remember, an academic year for a credit-hour or direct assessment program must include at least 30 weeks of instructional time (except in certain cases when Borrower Based Academic Year (BBAY) 1 is used to monitor annual loan limits), and for a clock-hour program, at least 26 weeks of instructional time. (See [Federal Student Aid Handbook, Volume 3, Chapter 1, Page 4](#) and the information on BBAY 1 in [Volume 3, Chapter 5, Page 104](#))

For more information, visit the [150% Direct Subsidized Loan Limit Information](#) page on the IFAP Web Site.

**Q7: What if a school has actual disbursements scheduled past the closeout deadline?**

**A7:** Exceptions to the last processing day of the program year may be made on a case-by-case basis, if a school’s processing period extends beyond the closeout deadline. Schools falling within this category should contact the COD School Relations Center at [CODSupport@ed.gov](mailto:CODSupport@ed.gov) for further assistance. Once the closeout deadline has passed, requests for extended processing may be made directly through the COD Web Site (refer to Q11 for more information).

**Q8: What happens if a school confirms closeout before the established data submission (closeout) deadline, but has additional records to report to the COD System?**

**A8:** If a school identifies additional disbursement or disbursement adjustment data after completing the balance confirmation process but prior to the closeout deadline, the school can request to be reopened via the Request Reopen/Extended Processing page on the COD Web Site (refer to Q11 for more information). Once the request is processed, the school can start processing immediately. The school will be considered no longer confirmed closed out and will receive a Reopen Change email. The email will be sent to the FAA and President.

**Q9: What if a school’s balance changes after confirming close out?**

**A9:** If a school’s balance changes due to refunds of cash or adjustments in G5, the school:

- Will receive a Reopen Change Letter via email.
- Will receive an updated Direct Loan SAS at the end of the month.

- If the balance change occurs before the closeout deadline, the school will be automatically reopened and is considered no longer confirmed closed out.
- If the balance change occurs after the closeout deadline, the school is considered no longer confirmed closed out. The school can request extended processing if needed to resolve the balance (see Q11).
- Must reconcile to a zero balance and complete the closeout confirmation process again.

**Q10: What happens after the closeout deadline?**

**A10:** The Department:

- Reduces the CFL to the greater of Net Drawdowns or Net Accepted and Posted Disbursements for all remaining open schools.
- Rejects award year-specific Direct Loan awards and disbursements.
- Discontinues year-specific Direct Loan reports.
- Discontinues year-specific Zero Balance and Remaining Balance emails.
- Issues a final Direct Loan SAS to all schools, using existing school SAS options.

**Q11: What if a school needs to submit student award or disbursement data to the COD System after the established data submission (closeout) deadline?**

**A11:** A school may seek relief from the deadline. Extended Processing/Administrative Relief from the deadline may be sought by a school in order to process into COD valid student level data via the Request Reopen/Extended Processing function in the COD System. Extended processing is available on a case-by-case basis, and will be granted for approved reasons.

To request Extended Processing log in to the COD Web Site at <https://cod.ed.gov> and complete the following steps:

1. Go to the School Summary Information screen by clicking on the School tab on the top blue bar.
2. Click on “Request Reopen/Extended Processing” link located on the left-hand side under School Information.
3. Complete all required fields – including choosing the reason for request from a drop-down menu and providing a short written explanation of the type of data that needs to be submitted. Examples: Restore Inadvertently Decreased Disbursement Data, Grade Level Change, SULA Data Update, or Refund/Decrease Disbursement. NEVER include Personally Identifiable Information (PII) data such as SSN, Name, Date of Birth, or Award Identifiers in this field.

If the request is approved, an Extended Processing letter will be sent via email to the FAA and President.

**Note:**

- An extension to the data submission deadline doesn’t negate any other data reporting deadline, student eligibility or disbursement requirements pertaining to the Title IV

programs nor does it imply the Department approves the school's failure to meet the established data submission deadline.

- Prior to seeking relief from the reporting deadline the school should have reviewed its records, consulted with the COD School Relations Center as necessary, to be sure that if a reporting extension is granted the school knows exactly what data needs to be submitted to the COD System and how to submit that data so the school's records will be on file correctly at the end of the extension period.
- A school on Heightened Cash Monitoring 2 (HCM2) should coordinate with its Institutional Review Specialist/Payment Analyst if the school finds it still needs to submit data after the established data submission deadline. The Payment Analyst/Institutional Review Specialist's understanding of the school's situation will enable him or her to contact us on the school's behalf via email and let us know what an appropriate extension period would be for the school. If this type of consultation takes place it may help to avoid the need for multiple extension requests. No school should seek an extension to the established student award data submission deadline until its financial aid staff has reviewed all of its records, knows exactly what data needs to be submitted to our data processing system (COD) and how to submit that data so the school's records will be on file correctly at the end of the extension period.

**Q12: What if a school does not resolve its Ending Cash Balance?**

**A12:** The school will be notified of its remaining balance through a Demand Letter or Negative Balance Letter. Any remaining positive balance will result in a final liability for the school.

**Q13: What tools are available to assist schools with Direct Loan Reconciliation and closeout?**

**A13:** There are various tools provided by the Department that your school can use to reconcile externally cash and disbursement data from the COD System, and identify any issues prior to completing the closeout process includes:

- **Direct Loan School Account Statement (SAS)** – The SAS is similar to a bank statement, and provides the Department's official Ending Cash Balance as of the end of the reported month, as well as detailed cash and loan or disbursement detail transactions for the reported period. The SAS is the school's primary tool used in reconciliation and program year closeout, and should be compared to both financial aid and business office records. Tip: Schools can choose to update SAS Options at the end of their processing period to receive year-to-date detail data for final reconciliation activities, even if they routinely receive monthly data as their default.
- **Direct Loan SAS Disbursement Detail on Demand** – ad-hoc report that allows schools to get SAS Disbursement Detail data independent of the school's monthly SAS file.
- **Direct Loan SAS Disbursement Detail on Demand Report Reader and Instructions** – formats the fixed length SAS Disbursement Detail on Demand Report into an Excel spreadsheet. Found under the "COD Resources" link at the bottom of any COD Web Site page.
- **Pending Disbursement List Report** – contains disbursements not yet funded in the COD System (Disbursement Release Indicator (DRI) = False).
- **Discrepant Loan Data Report** – helps schools identify awards that should be adjusted and/or corrected in their system in accordance with the 150% Direct Subsidized Loan Limit requirements.

- **COD Web Site (<https://cod.ed.gov>) pages:**
  - *Funding Information page* – (found under the “School” link in the blue tool bar along the top of the main page and the “Funding Info” link on the left-hand side under School Information)
  - *School Summary Financial Information page* – (found under the “School” link in the blue tool bar along the top of the main page and the “Summary Financial Info” link on the left-hand side under School Information)
  - *Cash Activity* – (found under the “School” link in the blue tool bar along the top of the main page and the “Cash Activity” link on the left-hand side under School Information), shows all individual Drawdown, Refund of Cash, and Drawdown Adjustment transactions. This information is sent to the COD System from G5. This information can be used to reconcile to internal bank statements and cash transactions.
  - *Anticipated Disbursement Queue* – (found under the “Batch” link in the blue tool bar along the top of the main page and the “Anticip Disb Queue” link on the left-hand side), lists all anticipated (pending) disbursements. It can be used to determine if anticipated disbursements need to be canceled (reduced to zero) or made into actual disbursements (DRI = True). This information is updated daily.
  - *Action Queue* – (found under the “Batch” link in the blue tool bar along the top of the main page and the “Action Queue” link on the left-hand side), lists records that are in review by FSA’s Payment Analysts for schools on HCM2. Can be used by schools to ensure all records that the school intends to submit in their HCM2 submission have been sent to the COD System.
- **Direct Loan Tools Software** – main function is to compare disbursement data from EDExpress or a school’s custom software/system to the disbursement data from the SAS and produce a discrepancy report. Schools with other software can create an external file to be used with DL Tools as well.
- **[G5 Website](#)**

**Q14: Where can schools find additional resources for closeout and reconciliation?**

**A14:** Additional resources for reconciliation are as follows:

- FSA Handbook - Volume 4 Chapter 6 – Reconciliation:  
<https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol4Ch6.pdf>
- COD Technical Reference, Volume IV – Direct Loan Tools:  
<https://ifap.ed.gov/codtechref/attachments/1819CODTechRefVol4.pdf>
- COD Technical Reference, Volume VI, Section 8 – Reports:  
<https://ifap.ed.gov/codtechref/attachments/1819CODTechRefVol6Sec8Reports.pdf>
- IFAP Announcements: <https://ifap.ed.gov/ifap/>
- COD Reconciliation Coordinators - contact via the main COD School Relations Center number at 1-800-848-0978