

Pell Grant LEU Dispute Escalation Process
Attachment to April 2014 Electronic Announcement

PELL GRANT LEU NON-DISPUTE ISSUES

If a current or former school has determined there is an error in its reporting of Federal Pell Grant (Pell Grant) data to the Department of Education (the Department) for an award year that is still active in the Common Origination and Disbursement (COD) System (currently 2008-2009 to 2014-2015), the school must correct the student's COD records by sending the appropriate award and disbursement corrections to the COD System and returning any associated Pell Grant funds to G5 as appropriate. ***These cases are not considered disputes***, a decision by the Department is not necessary, and there is no need to escalate the issue to the Department.

If a current or former school has determined there is an error in its reporting of Pell Grant data to the Department for an award year that is not still active in the COD System (currently any award year prior to 2008-2009), the school cannot correct the student's records and must contact the COD School Relations Center (800/474-7268 or CODSupport@ed.gov) and will be advised on what information it must provide to the Department. The Department will need documentation from the school to make any changes to the data in the COD System. ***These cases are not considered disputes***; however, because the school cannot correct the data itself, there is a need to contact the Department.

In either case, after allowing time for the corrections to be processed in the COD System, the current school should review the COD System to ensure that the student's Pell Grant data has been adjusted. Any Pell Grant disbursement submission by the current school before the Pell Grant data has been corrected will be rejected by the COD System.

PELL GRANT LEU DISPUTE PROCESS

In some cases, a school or student may dispute the accuracy of a student's Pell Grant information that resulted in the reported Pell Grant Lifetime Eligibility Used (LEU) percentage. This document provides information on the steps that must be taken by the student, the student's current school, the student's former school(s), if appropriate, and the Department when there is a Pell Grant LEU dispute. We use the terms "Pell Grant LEU" and "Pell LEU" interchangeably throughout the document.

Note: It is the responsibility of the student's current school to coordinate the resolution of the reported dispute with the other parties, as described below.

What the student needs to do:

A student who believes there may be an inaccuracy in the underlying Pell Grant data that is part of the student's Pell Grant LEU calculation may dispute that information by contacting his or her current school. In doing so, the student:

1. Must have filed a FAFSA for the current award year so as to ensure that the current school can view the student's Pell history on the Department's COD Web site.
2. Must provide all documentation requested by the current school in support of the student's assertion that there is an inaccuracy in the Pell Grant data. This documentation must include a signed and dated statement from the student that provides:

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- The name of the student's current school to whom the student reported the alleged inaccurate data;
- The name of the school that reported the alleged inaccurate information;
- The award year and disputed amount; and
- The reason the student believes the Pell Grant data are inaccurate.

Steps the current school must take when contacted by a student:

There are several steps that the student's current school must complete to meet its responsibilities to coordinate the resolution of the dispute on behalf of the student. These steps will determine whether the Pell Grant LEU dispute should be escalated to the Department for final resolution.

The student's current school will:

1. Check the Pell LEU History Screen on the COD Web site to obtain a complete history of the student's Pell Grant funding.
2. Determine if the disputed amount, if resolved, would bring the student's Pell Grant LEU to less than 600%. If it would not, inform the student that he or she would remain ineligible for Pell Grant funds even if the disputed amount were adjusted, and do not escalate the matter.
3. Determine if there has been a change to the student's identifiers (date of birth and/or Social Security Number) and check all known combinations on the Pell LEU History Search page on the COD Web site to determine whether the student might have more than one Pell LEU History record. If it is determined that a discrepancy in the student's identifiers could be a factor in the inaccuracy of the underlying data in the calculation of a Pell Grant LEU, the case should be escalated to the Department. See the escalation procedures below.
4. Determine through COD, NSLDS, and any institutional records whether other forms of student aid were received by the student during the disputed timeframe at any institution. The Department will deny the dispute unless there is documentation to explain how the student received other aid funds, but not Pell Grant funds during the same timeframe.
5. Determine if a reporting error was made by the current school. If so, the data should be corrected. These are not considered disputes. See more about correcting errors in the Pell Grant LEU Non-Dispute Issues section above.
6. If the disputed amount is from data provided by one or more of the student's former schools, the current school must contact the former school(s) in an attempt to determine if an error was made.
 - If the former school acknowledges that it had made an error and that it will correct the error, the former school must follow the steps below for former schools. Also see Pell Grant LEU Non-Dispute Issues section above.

After allowing time for the former school to submit the agreed upon corrections to the COD System, the current school should review the COD Pell LEU History screen to ensure that the student's Pell Grant data has been adjusted. Any Pell Grant disbursement submission by the current school before the Pell Grant data has been corrected by the former school will be rejected by the COD System.

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- If the former school believes that the COD System information it provided is not in error, (or the former school is not responsive to the current school's requests) the current school must coordinate the dispute on behalf of the student by escalating the case to the Department (see below for escalation instructions). Upon creating a Pell LEU Dispute Escalation through the portal and receiving a Dispute ID, the current school must request that the former school submit to the Department documentation to support the former school's assertion that the student did receive the Pell Grant funds as the former school reported. When submitting the documentation through the Pell LEU Dispute Portal, the former school must use the Dispute ID provided by the current school.

Note: The former school is expected to cooperate with the current school's request for information needed to document the alleged discrepancy. If the former school does not cooperate with the current school, the current school's escalation to the Department will result in direct follow-up by the Department with the former school.

7. If the current school determines that there is no discrepancy with the student's Pell Grant data or the documentation does not support the alleged discrepancy, the current school should counsel the student accordingly and does not need to escalate the case to the Department.

Steps the former school must take if contacted by the student's current school about a Pell Grant LEU dispute:

If the disputed amount is from data provided by one or more of the student's former schools, the current school must contact the former school(s) in an attempt to determine if an error was made. The former school must complete the steps below to help the current school facilitate the dispute on behalf of the student. These steps will assist the current school in determining whether the Pell Grant dispute is one that should be escalated to the Department for resolution.

The student's former school will:

1. Determine if the Pell Grant disbursement information it reported is correct by –
 - Determining if it has records related to the student that indicate that the student did receive Pell Grant funds for the relevant award year and in the amount that is included in the COD System (e.g.: the former school has records from the Registrar's office that indicate the student attended, or the Bursar's office has records that indicate financial aid funds were disbursed, etc.).
 - Determining through COD, NSLDS, and any institutional records whether other forms of student aid were received during the disputed timeframe. The Department will deny the dispute unless there is documentation to explain how the student received other aid, but not Pell Grant funds during the same timeframe.
2. If the former school determines that it made a reporting error, it must correct the error. This is not considered a dispute. Please see the Pell Grant Non-Dispute Issues section above.
3. If the former school believes that the COD information it provided is not in error, the former school must cooperate with the current school and provide to the Department documentation of its assertion the Pell Grant LEU information is correct. When submitting the documentation through the Pell LEU Dispute Portal, the former school must use the Dispute ID provided by the current school.

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ESCALATION

What the current school needs to do to escalate the case to the Department:

Once the current school has completed the steps above and determined that the Pell Grant LEU dispute should be escalated to the Department, the student's current school will initiate the dispute via the Pell LEU Dispute Portal on the COD Web site. A Dispute ID will be assigned to the dispute, and the current school will be advised on what next steps and documentation will be required based on the case details.

1. The current school must include in its escalation the signed statement (explained in the student section above) that attests that the student did not receive Pell Grant funds and/or did not attend the school during the timeframe in question. Depending on the basis for the dispute, some possible forms of documentation include, but are not limited to: proof of birthdate, name, and/or social security number.
2. If the dispute involves a Pell Grant at a former school, ensure that the Dispute ID for the dispute is given to the former school. The former school must reference the Dispute ID on any documentation submitted to the Department.
3. All documentation should be uploaded via the Pell LEU Dispute Portal.

What the former school needs to do to support the escalation of the case to the Department:

1. Using the Dispute ID provided by the current school, the former school will provide the Department with information and documentation to support its assertion that the student did receive the disputed Pell Grant funds. Depending on the basis for the dispute, possible documentation from the former school may include: verification from the Registrar of the student's enrollment for the timeframe in question; verification from the financial aid administrator that the school awarded Pell Grant funds, verification from the Bursar's office that the disputed Pell Grant funds were disbursed to the student (including accounting transactions and/or cancelled checks).
2. All documentation should be uploaded via the Pell LEU Dispute Portal with the Dispute ID provided by the current school.

What the Department will do:

Once all the necessary documentation is submitted via the Pell LEU Dispute Portal:

1. Department staff will review the dispute and supporting documentation. The Department may ask for additional information or render a decision. Once a decision is made, the Department will provide all relevant schools with either:
 - An approval notification. The current school will then be able to disburse additional Pell Grant funds to the student.
 - A denial notification. The current school will not be able to disburse additional Pell Grant funds to the student.

Note: Schools will be able to view the status of the dispute, and adjusted Pell Grant LEU on the Pell LEU Adjustment and the Pell LEU Dispute sections of the COD Web site's Pell LEU History screen respectively.

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2. The current school will be able to use the hyperlink on the Pell LEU History Page to receive a summary that can be given to the student documenting the Department's decision regarding the dispute.