

COD Update for Award Year 2015 - 2016

U.S. Department of Education | Federal Student Aid

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COD Update for Award Year 2015 - 2016

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COD Update for Award Year 2015 - 2016

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COD Update for Award Year 2015 - 2016

Agenda

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

COD Update for Award Year 2015 - 2016

Agenda - Continued

- COD Modifications to comply with changes to the Direct PLUS Loan Program
 - ✓ Changes to adverse credit criteria
 - ✓ Credit check “window of validity” extended from 90-days to 180-days
 - ✓ New Direct PLUS Loan Counseling Requirement
- Other changes to COD
 - ✓ Credit Status Response request screen
 - ✓ Other COD screens

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

COD Update for Award Year 2015 - 2016

New Award Year Setup for 2015 – 2016 included the “normal” changes that occur from one award year to the next...

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

COD Update for Award Year 2015 - 2016

The Funding Method remains “Advance Funded”

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

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Advance Funded Direct Loan schools with a history of “early” disbursement activity, received their initial Current Funding Level (CFL) the week of April 6, 2015

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

COD Edit Modifications

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COD Reject Edit Code #050

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

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

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

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

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COD Reject Edit Code #205

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

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

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

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

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COD Reject Edit Code #996

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

COD Update for Award Year 2015 - 2016

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

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

Direct Loan Rebuild File

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COD will update the Direct Loan Rebuild File

- Anticipated disbursements will be removed from the Origination record and moved to the Disbursement record
 - ✓ The current Disbursement Release Indicator field will indicate actual or anticipated disbursement data
- Subsidized Usage Limit Applies (SULA) data fields that already exist on the Disbursement record will now be applied for both anticipated and actual disbursements
 - ✓ Payment Period Start Date
 - ✓ Program CIP Code
 - ✓ Enrollment Status

SULA Inquiry/SULA Calculator Screen

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COMMON ORIGINATION & DISBURSEMENT

FSA
FEDERAL
STUDENT AID

Person School Batch Award Services User Program Support Admin

Person Search
Counseling Search
MPN/ATS Search
PLUS App Search
Endorser Search
Credit Check
Post Data Archive
Applicant Search
Applicant Search
Pell LEU History Search
Subsidized Usage Search
Escalation
Servicer

Return to: [Subsidized Usage Search](#)

Direct Subsidized Loan Usage

[Export Summary To XLS](#)

Sum Actual Subsidized Usage Periods: 1.0

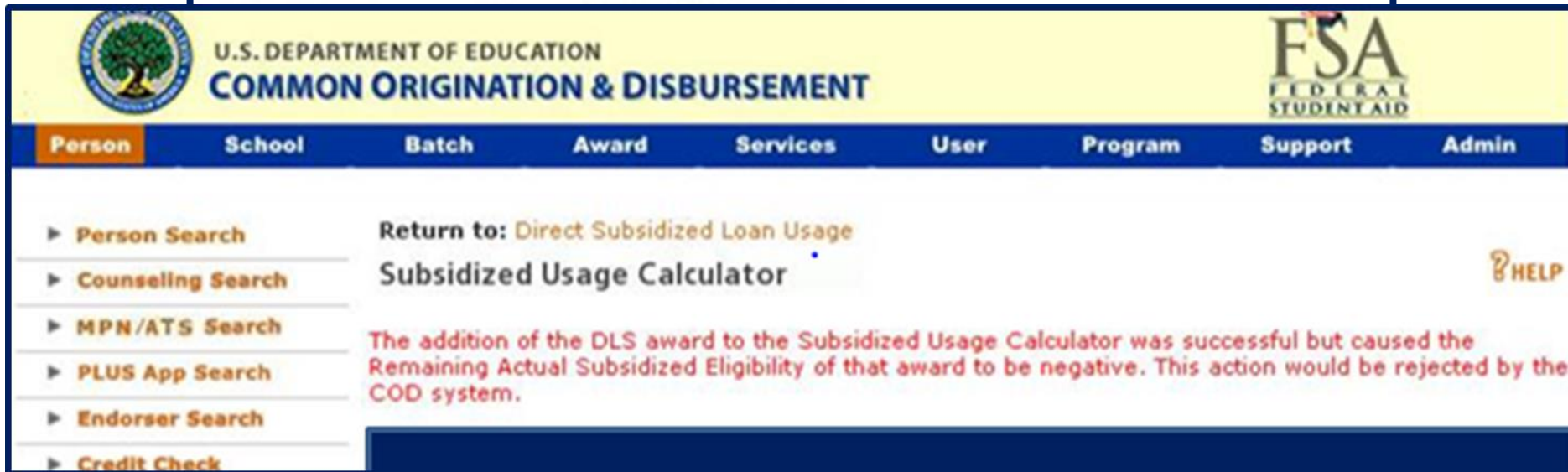
Direct Subsidized Loan Summary

Attending School	Award ID	Maximum Subsidized Eligibility Period	Actual Subsidized Usage Period	R S P
Year '14-'15				
COLLEGE -		6.0	1.0	
Year '13-'14				
COLLEGE -				

[Create Subsidized Usage Inquiry](#) [Subsidized Usage Calculator](#)

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XML Schema Version 4.0b

COD Update for Award Year 2015 - 2016

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

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

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

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

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

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

New Student Eligibility Tag

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

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

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Valid values for the <StudentEligibilityCode> tag

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

Modifications to COD for Changes to the Direct PLUS Loan Adverse Credit History Criteria and new PLUS Counseling Requirement

COD Update for Award Year 2015 - 2016

Effective March 29, 2015...

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

COD Update for Award Year 2015 - 2016

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

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

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

- Has a default determination, bankruptcy discharge, foreclosure, repossession, tax lien, wage garnishment, or write-off of a Title IV debt during the preceding five years

OR

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

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

- NOT award year specific

- ✓ A credit check performed on or after March 29, 2015, will be used for the upcoming 2015 – 2016 award year

AND

- ✓ A late Spring 2015 or Summer 2015 Direct PLUS Loan application

- ✓ No impact on the eligibility of a borrower who had ***previously been approved*** to receive a Direct PLUS Loan for all or part of the 2014-2015 academic year including Spring and/or Summer 2015 terms

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

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

PLUS Counseling

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PLUS Counseling is a distinct and unique counseling module

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

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Complete Counseling

Choose Loan Counseling Type

A counseling session will take at least 30 minutes to complete. You must complete the counseling in a single session. You cannot save a partially completed counseling session.

Entrance Counseling Required Start Entrance Counseling	Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student. Useful Information to Have
Financial Awareness Counseling Start Financial Awareness Counseling	Financial Awareness Counseling provides tools and information to help you understand your financial aid and help you manage your finances. Complete this counseling any time. Useful Information to Have
PLUS Counseling Start PLUS Counseling	PLUS Counseling is required if the U.S. Department of Education has informed you that you have an adverse credit history and you have obtained an endorser or documented to the satisfaction of the U.S. Department of Education that there are extenuating circumstances related to your adverse credit history. PLUS Counseling can be completed voluntarily at any time. If PLUS Counseling is completed voluntarily and you are determined to have an adverse credit history by the U.S. Department of Education within 30 days of PLUS Counseling completion, your PLUS Counseling requirement will be considered to be fulfilled. Useful Information to Have
Exit Counseling Required Start Exit Counseling	Exit Counseling is required when you graduate, leave school, or drop below half-time enrollment ®. Exit Counseling provides important information you need to prepare to repay your federal student loan(s). At the end, you'll need to provide the name, address, e-mail address, and telephone number for your closest living relative, two references who live in the U.S., and current or expected employer (if known). Useful Information to Have

COD Update for Award Year 2015 - 2016

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

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

COD Update for Award Year 2015 - 2016

The screenshot displays the Federal Student Aid website interface. At the top, the title "COD Update for Award Year 2015 - 2016" is centered. Below this, the website header includes the "Federal Student Aid" logo, the text "PROUD SPONSOR of the AMERICAN MIND™", and the "StudentLoans.gov" logo with "English | Español" language options. A navigation bar contains tabs for "My Account", "Getting Loans", "Tools and Resources", "Managing Repayment", "FAQs", and "Contact Us". The "Getting Loans" tab is active, showing a dropdown menu with the following items: "Entrance Counseling Demo", "PLUS Counseling Demo" (highlighted with a red box), "Direct Consolidation Loans", "Master Promissory Notes", "PLUS Request", "Endorse Addendum", "Direct Consolidation Loans", and "Income-Driven Repayment". On the right side of the page, there is a "Log in to StudentLoans.gov" button and a note: "Visit the FSA site if you are a new user or have forgotten your PIN." The footer of the page repeats the "Federal Student Aid" logo and "PROUD SPONSOR of the AMERICAN MIND™" text.

“Credit Requirements Met”

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COD will send a new <CreditRequirementsMet> tag

- Confirms that all ***credit related*** requirements have been met and the PLUS loan can be disbursed
 - ✓ An approved endorser or approved appeal
 - AND
 - ✓ PLUS Counseling has been completed
- Sent in the Common Record response, a StudentLoans.gov PLUS Request response and for a failed COD Web credit check
- Will also be sent in the new system-generated Credit Status response
- “Credit requirements met” does NOT mean that other eligibility requirements have been met

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The new “Credit Requirements Met” should be your focus...

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

“Credit Status System-Generated Response”

(Doc Type CS)

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COD will begin sending a new system-generated Credit Status Response

- Sent with the intent to keep the school “in the loop” on a borrower that may be in the process of “resolving” his or her denied credit decision
 - ✓ Sent on approval or denial of an endorser/appeal
 - ✓ Sent when special PLUS Counseling is completed
 - ✓ ***Will include the new <CreditRequirementsMet> tag***
- Contains additional PLUS Loan credit data
- Message Class is CRCStxxOP
 - ✓ Identified as Doc Type CS on Batch Screens

COD Update for Award Year 2015 - 2016

The new system-generated Credit Status Response will have new fields and values...

- Original Credit Decision Status
 - ✓ Always sent
 - “A” if approved
 - “D” if Denied
- Credit Decision Date
 - ✓ Always sent
- Credit Decision Expiration Date
 - ✓ Always sent

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The new system-generated Credit Status Response will have new fields and values

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

COD Update for Award Year 2015 - 2016

The new system-generated Credit Status Response will have new fields and values...

- Credit Action Status
 - Populated if one of the three values below apply
 - “D” indicates an endorser addendum has NOT been linked and has been denied as a result of the endorser’s adverse credit history
 - “L” indicates the endorser is approved but for a lesser amount than the denied PLUS Loan award amount
 - “N” indicates the credit result has changed after resolving a “Pending” credit decision

COD Update for Award Year 2015 - 2016

The new system-generated Credit Status Response will have new fields and values...

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

COD Update for Award Year 2015 - 2016

The new system-generated Credit Status Response will have new fields and values...

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

COD Update for Award Year 2015 - 2016

The new system-generated Credit Status Response will have new fields and values...

- Credit Requirements Met
 - ✓ Always sent
 - “Y” if PLUS Counseling has been completed
 - “N” if PLUS Counseling has NOT been completed
- Endorser Amount
 - ✓ Sent ONLY when an endorser addendum = TRUE
- The Credit Override (Doc Type CO) system-generated response will be retired
 - ✓ The CS system-generated response will carry the credit associated data to the schools

Other COD Changes

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

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

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COD will create a new weekly “Credit Status Report”

- Posted weekly to the COD Website
 - ✓Your School NewsBox
 - ✓Under the “Services” tab
 - ✓COD Reports hyperlink
- CSV (Comma Separated Value) format
- Saturday to Friday reporting window

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

The screenshot shows the COD Website interface. At the top, there is a yellow header with the U.S. Department of Education logo on the left, the text "U.S. DEPARTMENT OF EDUCATION COMMON ORIGINATION & DISBURSEMENT" in the center, and the FSA Federal Student Aid logo on the right. Below the header is a blue navigation bar with tabs for "Person", "School", "Batch" (which is highlighted), "Award", "Services", "User", "Program", "Support", and "Admin".

On the left side, there is a vertical menu with several options, each preceded by a right-pointing arrow: "Batch Search", "Action Queue", "Report Requests", "PLUS App Rsp Request", "Counseling Request", "Credit Status Request" (which is expanded to show a downward arrow), "SULA Request", "Post Data Arc Search", and "DL Origination Tool".

The main content area is titled "Request Credit Status Response" and includes a "HELP" icon. Below the title, there is a descriptive text: "Use this screen to search for Credit Status information and request the responses." A gray box contains the following instructions: "To request the Credit Status information for a borrower, enter the following:"

There are three input fields: "Entity ID Type" with a dropdown menu showing "COD", "Entity ID" with a text box, and "Borrower's SSN" with a text box. A blue "Submit" button is located at the bottom right of the gray box.

COD Modifications for PLUS Counseling

COD will modify the COD Website screens below

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

Forewarned is Forearmed...

What Can You Do To Prepare?

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What can you do to prepare?

- If you provide Direct PLUS Loan information on your school website you should update it to include information on the new PLUS Counseling requirement
- You should update any correspondence you send to Direct PLUS Loan borrowers to include information on the new PLUS Counseling requirement
- Talk with your Software provider to make sure you understand how your solution will capture, store, and display credit relative data
- You may need to modify or change your day-to-day routine to make sure you have the means to successfully monitor a borrower's attainment of "Credit Requirements Met"

Resources

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COD Modifications for PLUS Counseling

COD Resources

- COD School Services
 - ✓ Phone...1.800.848.0978
 - ✓ Email...CODSupport@ed.gov
- COD Applicant Services (Direct PLUS Loan Support)
 - ✓ 1.800.557.7394
- COD Technical Reference for Award Year 2015 – 2016
- Federal Loan School Support Team
 - ✓ Email...dlops@ed.gov

COD Modifications for PLUS Counseling

Electronic Announcements

- Become familiar with EAs already posted to IFAP (IFAP.ed.gov) and those to come over the next several weeks
 - ✓ EA dated January 27, 2013
 - ✓ EA dated February 3, 2015
 - ✓ EAs (2) dated February 27, 2015

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