The Common Origination & Disbursement System (COD)





Agenda

- A quick look back
 - ✓ Major COD changes for AY 2015 2016
- New Year Award Setup for AY 2016 2017
 - √ School-facing modifications
 - √ Spring release
 - √ Summer release
 - √ Fall release
- Still to come...



Major COD Changes for Award Year 2015 – 2016





Changes to the Direct PLUS Loan Program



Direct PLUS Loan Program enhancements included...

- New adverse credit history criteria
- A requirement to complete a session of PLUS
 Counseling as a condition of eligibility for a Direct PLUS
 Loan with an original credit result of "Denied"
- The credit check "window of validity" was expanded from 90 days to 180 days



An applicant has an adverse credit history if, as of the date of the credit report, the applicant...

 Has a default determination, bankruptcy discharge, foreclosure, repossession, tax lien, wage garnishment, or write-off of a Title IV debt during the preceding five (5) years

OR

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



A borrower whose Direct PLUS Loan credit check was returned as "Denied" based on an adverse credit history can gain eligibility for the loan by ...

- Securing an approved endorser/Successfully appealing the adverse credit decision
- In either case the applicant will be REQUIRED to complete a session of PLUS Counseling
 - ✓PLUS Counseling MUST be completed before disbursement of the Direct PLUS Loan funds
 - ✓ A session of PLUS Counseling will be required for each original credit decision of "Denied"



PLUS Counseling is a distinct and unique counseling module

- PLUS Counseling is NOT Entrance Counseling
 - ✓ Does not fulfill the Entrance Counseling requirements
 - ✓A first-time Graduate/Professional student with an original credit decision of "Denied" could be required to complete both modules
- PLUS Counseling is provided ONLY via the StudentLoans.gov (SLG) website



COD created a new weekly "Credit Status Report"

- Identifies borrowers whose most recent original credit decision is "Denied" and is NOT expired
- A borrower drops off the report 30 days after
 - ✓ Credit Requirements Met = Y
 - √ The Direct PLUS Loan award is reduced to \$0
 - √ The credit decision expiration date has been reached

COD retired two (2) reports

- System-generated Credit Override Response (CRCO)
- Credit Check Reconsideration Eligibility Report



New XML Schema 4.0b



COD Release 14.0 for AY 2015 – 2016 saw a Common Record XML Schema change from 4.0a to 4.0b

- <AbilityToBenefit> tag was re-named
 - <StudentEligibilityCode>
 - ✓ New and altered Student Eligibility Codes for AY 2015 2016 and forward



XML Schema Version 4.0b carries a new and significant <CreditRequirementsMet> tag

- Indicates that a Direct PLUS applicant has met all CREDIT RELATED requirements
- <CreditRequirementsMet> = Y when...
 - √ Original credit decision = "A"

OR

✓ An approved endorser/successful appeal

AND

✓ A completed session of PLUS Counseling



A new system-generated "Credit Status Response"

- Intent is to keep the school "in the loop" on a borrower that may be in the process of "resolving" his or her original credit decision of "Denied"
 - ✓ Sent on approval or denial of an endorser/appeal
 - ✓ Sent when PLUS Counseling is completed
 - ✓ Includes the new <CreditRequirementsMet> tag
- Contains additional Direct PLUS Loan credit data*
- Message Class is CRCSxxOP
- Remember that you cannot disburse a Direct PLUS Loan unless the <CreditRequirementsMet> tag = T



Other COD Changes





COD implemented several additional enhancements for Award Year 2015 - 2016

- SULA Inquiry/SULA Calculator screen
- "Live Chat" functionality
- Option to download "select" data in CSV format...
 - ✓ Includes financial data
- Disbursement amount and date change in the same transaction
- Created a new "School Funding History" Report"
 - √Via a hyperlink on the "School Funding information"
 Screen" on the COD Web



A new Direct Loan repayment option was provided via StudentLoans.gov last December

- The StudentLoans.gov website now allows borrowers to select the new "REPAYE" (*Refined* Pay As You Earn) loan repayment option
 - ✓ Income dependent repayment plan
 - ✓ Payment no more than 10% of discretionary income
 - ✓ Loan interest assistance
 - ✓ Balance on loans for undergrad studies can be forgiven in 20 years
 - ✓ Balance on loans for graduate studies can be forgiven in 25 years







COD Changes for Award Year 2016 – 2017



COD implemented the New Award Year Setup for Award Year (AY) 2016-2017 on March 14th

- Included the normal "award year to award year" changes
 - ✓AY designator in IDs changed from '16 to "17"
 - ✓ AY specific options incremented one year
- No change to the XML Schema
- COD no longer returns the Common Record Receipt
 - ✓ Message class CRRCxxOP is retired
 - ✓ No impact on Common Record Responses sent via Message Class COMRECxxOP



COD was migrated from a legacy mainframe to a midrange computing platform

- Necessitated the unusual 5-day "down-time" for implementation
- Enhances processing and data security
- Several issues were identified and resolved shortly after implementation
 - ✓A handful of issues are currently under research and will be resolved as soon as possible
- No display or operational differences



Upcoming COD Release for Summer, 2016

- StudentLoans.gov will be modified to enhance the user experience for those accessing the website via a mobile device
 - ✓ Data will display in a format appropriate to the mobile device used to access the website
- Will offer a new Direct Consolidation Loan landing page
 ✓Enhanced Direct Consolidation Loan application
- Login using an FSA ID will be at each "function"
 - ✓ For example, Login to the MPN screens to complete an MPN



- TEACH-ATS website will be integrated into StudentLoans.gov
 - ✓ Creates a single "Applicant" website
- COD will return a borrower's default status on the system generated "SP" response
 - ✓ Status will be determined from NSLDS data



- Modification to existing Edit #046 Incorrect Academic Year Dates
 - ✓ Award Year 2016 2017 and forward
 - ✓ Schools are reporting Academic Year Start/End Dates
 that are less than the required minimum number of weeks
 - ✓ Edit #046 will be modified to trigger when submitted Academic Year Start/End Dates do not equal at least 26 weeks



- Modification to existing Edit #205 Payment Period Start Date is outside the award Start/End Dates
 - ✓ Modified to NOT trigger on a \$0 disbursement that has a Payment Period Start Date *OUTSIDE* the loan period even when the disbursement date remains *INSIDE* the loan period



- New SULA Warning Edit #219
 - ✓ Award Year 2016 2017 and forward
 - ✓Will CORRECT an award amount down to equal the sum of the actual and anticipated disbursements on a maintenance submission when the loan amount exceeds the sum of the disbursement amounts
 - √The changed loan amount will be returned to the school in the response



- New SULA Warning Edit #220 Zero Disbursement Inside Loan Period
 - ✓ Award Year 2014 2015 and forward
 - ✓Will trigger at the disbursement level when a disbursement is reduced to \$0 but the Payment Period Start Date remains inside the loan period
 - ✓Will trigger at the award level when the award Begin and/or end date is changed so a disbursement reduced to \$0 has a Payment Period Start Date that remains inside the loan period



- "Zero Disbursement Exception Logic" will be modified to use Payment Period Start Date instead of Disbursement Date
 - √When a disbursement is reduced to \$0 and has a
 Payment Period Start Date outside the loan period, COD
 will exclude the disbursement from the Subsidized Usage
 calculation



Upcoming COD Release for Fall, 2016

 COD will exclude a Direct Subsidized Loan from a Subsidized Usage Period calculation if it has an Earliest Disbursement Date (EDD) in a period during which the borrower had an outstanding balance on a Federal Title IV loan and was exempt from SULA



- Both the <EnrollmentDate> and
 <PaymentPeriodStartDate> tags for grants will no longer be "correcting" for correcting schools
- If data is submitted that is outside the valid date range the record will be rejected
- Award Year 2016-2017 and forward



- Both the <EnrollmentDate> and <PaymentPeriodStartDate> tags for grants will have their valid dates re-defined
 - ✓ Field values will be expanded from January 1 to October1 of the year prior
 - ✓ EXAMPLE: for the 2016-2017 Award Year the valid date range is October 1, 2015 thru June 30, 2017
 - √The "End Date" will not change and will remain June 30
 of the second year of the Award Year pair
- Award Year 2015-2016 and forward



COD will be "Sweet" as a Nectarine in 2017-2018



On the horizon...

 We're about a year out from the New Award Year Setup for AY 2017-2018...LOTS CAN HAPPEN BETWEEN NOW AND THEN...

But...

- FSA hopes to implement several "school-facing" changes for that award year
- KEEP IN MIND...some enhancements could be modified, delayed, or even wind up on the "wish we could have" list...



On the horizon...a few on our "wish list"

- Provide StudentLoans.gov users with self-service functionality
- Provide an Electronic Statement of Account (ESOA) for the Direct Loan & TEACH Programs
- Create a Multiple Reporting Record (MRR) for the Direct Loan & Iraq and Afghanistan Service Grant
- Modify the COD Web to include a set of Direct Loan tools for school users
- Enhance the Origination & Disbursement Tool
 ✓ More robust and more features



On the horizon...a few more

- Improve the COD Web Action Queue
- Enhance COD Web batch searches to include additional student and batch level criteria
- Implement a School Account Statement for Pell and Iraq & Afghanistan Service Grant Programs
- Enhance the COD
- Implement an Origination & Disbursement and Applicant Web demonstration site





Resources

COD

- COD School Relations Center (8AM-11PM EST)
 - ✓ Phone...1.800.848.0978 (D/L)
 - ✓ Phone...1.800.474.7268 (Grants)
 - ✓ Phone...1.800.557.7394 (Student Loan Support Center)
 - ✓ Email...CODSupport@ed.gov
- COD Technical Reference for Award Year 2015 2016
- COD Technical Reference for Award Year 2016 2017
- Federal Loan School Support Team
 - ✓ Email...dlops@ed.gov
- Dear Colleague Letters & Electronic Announcements posted to ifap.ed.gov







Wood Mason U.S. Department of Education Federal Student Aid Atlanta, GA 770.383.9662 (office) 202.821.3951 (cell) wood.mason@ed.gov

