

Common Origination and Disbursement Frequently Asked Questions

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Overview

This Frequently Asked Questions (FAQs) document is an introduction to the Common Origination and Disbursement (COD) process.

Schools, third-party servicers, and software providers can find detailed processing requirements and business rules in the **COD Technical Reference**. The COD Technical Reference contains key information to assist with the development and implementation of financial aid systems/software that will interface with the COD System.

Additional FAQs specific to the Campus-Based programs are available on the COD website.

COD System Basics

1. What is the COD System?

Common Origination and Disbursement (COD) is the system for processing, storing, and reconciling, Federal Pell Grant (Pell Grant), Iraq and Afghanistan Service Grant (through 2023–24), Teacher Education Assistance for College and Higher Education (TEACH) Grant, and William D. Ford Federal Direct Loan (Direct Loan) financial aid data.

Schools participating in any of the Campus-Based programs (including Federal Perkins Loan, Federal Supplemental Educational Opportunity Grant, and Federal Work-Study) use the COD System to report expenditures and apply for funds using the Fiscal Operations Report and Application to Participate (FISAP), and access all Campus-Based forms, waivers, and notifications.

2. How often is the COD System changed?

The COD System is updated annually (usually in the spring) to implement functionality for a new award year. Additional updates to the COD System may occur during an award year, as needed. The latest information on new and updated features to the COD System is found in Electronic Announcements posted on the **Knowledge Center**.

3. How do schools, third-party servicers, and software developers obtain information about COD processing issues?

Schools, third-party servicers, and software developers can obtain information about current production issues, news, and COD System functionality through various channels such as the **COD website** and the **Knowledge Center**. The following communication sources provide information to COD System users:

- **COD Web Messages:** FSA Partner and School Relations Center posts messages on the COD website that provide users with information about the COD System processing, maintenance, holiday schedules, and new release functionality.
- **COD Processing Updates:** The COD Processing Update provides information related to the COD System. Generally, it is published on the COD website by Noon Eastern time (ET).
- **Electronic Announcements:** Electronic Announcements are frequently posted on the **Knowledge Center**. These announcements provide updates on the COD System processing, functionality, and program requirements that affect the Campus-Based, Direct Loan, , Pell Grant, and TEACH Grant programs.
- **Network Messages:** Network Messages are placed in schools' Student Aid Internet Gateway (SAIG) mailboxes. These messages provide updates on processing, functionality, and program requirements that affect the Campus-Based, Direct Loan, , Pell Grant, and TEACH Grant programs.

FSA Partner and School Relations Center

1. Who do I contact when I need assistance with the COD System?

Schools (including foreign schools), third-party servicers, and software developers may contact the FSA Partner and School Relations Center with questions regarding the COD System. Customer service representatives (CSRs) are available Monday through Friday, 8 a.m. – 8 p.m. ET at 1-800-848-0978. Schools can also email **CODSupport@ed.gov**.

Schools can also utilize the Live Chat feature that will allow authenticated users (at both schools and third-party servicers) to interact with a CSR via a live chat session during regular business hours. Users **must** be signed in to the website to use the live chat feature.

To initiate a chat session, users can click on the "Chat with a Representative" link on the "Contact Us" page of the COD website.

Note: Chat sessions operate in a separate browser window from the COD website, so an authenticated user can continue working within the COD website while in a chat session. However, actions within the chat session alone do not prevent the COD web session from timing out after 15 minutes of inactivity.

2. How can the COD CSRs assist schools and third-party servicers?

CSRs are available to:

• Answer COD processing questions about the Campus-Based, Direct Loan, Iraq and Afghanistan Service Grant, Pell Grant, and TEACH Grant programs.

- Provide tips on website navigation.
- Assist with any additional concerns or questions regarding the COD System.

Additionally, there are a number of tools that alert CSRs to risk areas so they can perform outreach to schools to prevent any potential problems and help meet regulatory and reporting requirements.

Schools also receive support through the following customer service functions:

- Support to schools and third-party servicers for testing school software applications with the COD System.
- Support for XML (Common Record) issues.
- Online access on the COD website to view and update cases opened with the FSA Partner and School Relations Center.
- Specialized Reconciliation Team to assist schools in reconciliation and closeout.

3. Can schools track their cases with the COD School Relations Center?

Schools can also go to the "My Cases" page on the COD website which allows authorized users to view, search, update, or create cases with the FSA Partner and School Relations Center. This page is accessible via a link labeled "Customer Support" along the top navigation bar of the COD website. When a user clicks on "Customer Support" he or she is taken to the "My Cases" landing page which lists the cases with the FSA Partner and School Relations Center, as well as the status of the case. **Note:** A user must be the Primary Contact on a case for it to appear in the list.

4. Are there other ways schools can contact Federal Student Aid for assistance?

Yes. Schools can refer to the **Help Center on FSA Partner Connect**. This web page includes helpful contact information for all Federal Student Aid programs including frequently called help lines, phone numbers, email addresses, and website addresses.

Detailed information that is specific to foreign schools can be found on the **Foreign School Information Page** located on the Knowledge Center.

The COD Website

1. What functionality does the COD website provide?

The **COD website** is a tool for processing and viewing Direct Loan, Pell Grant, and TEACH Grant data. Users can

- track funding levels, dates, and amounts of all cash receipts and returns of cash.
- create/change award and disbursement data online rather than sending data by the batch process.
- view Grant and Direct Loan reports and provides a report request function to assist schools in reconciling data between their institutions and the COD System throughout the processing year and in year-end closeout.
- view data by program and program year.
- set several options for *Master Promissory Note* (MPN) processing as well as options for how a school's borrowers use StudentAid.gov.
- view MPN, Counseling data, Direct PLUS Request data, Subsidized Usage data, Endorser Addendum, and Annual Student Loan Acknowledgement data. A calculator is also available to

help schools model the potential impact of additional loans on a student's Subsidized Usage and eligibility.

- Complete Return of *Title IV* (R2T4) calculations.
- request extended processing to submit increases to award or disbursement or new disbursements after the data submission (closeout) deadline.
- confirm closeout via the School Balance Confirmation page on the COD website by completing the School Balance Confirmation form

For Campus-Based, the COD website is used to apply for Campus-Based funds, report expenditures, and access all Campus-Based forms, waivers, and notifications.

2. How do schools and third-party servicers get access to the COD website?

To gain access to the **COD website**, a school or third-party servicer users must be enrolled for the COD Online Service through the SAIG Enrollment website **and** have an FSA User ID and password and have a Two-Factor Authentication (TFA) token.

3. How do schools update their contact information on the COD website?

COD Security Administrators (School User Level 5) can update their Grant and/or Direct Loan program's contact information on the **COD website**. Once logged into the COD website, choose an entity ID type, and enter one of your school code entity IDs (COD, Direct Loan, Pell, OPE, GAPS, or UEI number) that correspond with the chosen entity ID type, then click search. Once you have pulled up your school, click on the "Financial Aid Contact" link located on the left-hand side. The screen will display the current information for your institution. You are then able to update and/or add new financial aid contact information by clicking on the "Update" or "Add New" tab.

Campus-Based financial aid contact information must be updated separately by accessing the Campus-Based section of the **COD website** (from the "School" tab). On the Campus-Based homepage, click on "School Information," then "Demographics" to edit financial aid administrator information.

In accordance with 34 CFR 600.21, changes to school name, school address (including your branches and locations), names of the Chief Executive Officer/President, Chief Financial Officer (or the equivalent title) or Director of Financial Aid must be reported to the Department of Education. These changes must be reported using the **Electronic Application for Approval to Participate in Federal Student Financial Aid Programs (E-App). Note:** The E-App is now submitted through FSA Partner Connect. Once the information is submitted through E-App, the **COD website** is normally updated with the new information in 24 hours. It may take longer if additional information is required by the School Participation Management Team.

Keep in mind that the Financial Aid Administrator or Director of Financial Aid email address is used to deliver time sensitive materials, containing critical COD processing related information, to your school. Ensure this contact information contains the most current email address.

To ensure a school receives all system-generated school correspondence, also check the following:

- Verify that current contact information for the school is correct. COD web users can do this by going to the "School" tab and clicking on the "Financial Aid Contact" link on the left side of the screen. Update the contact information as necessary.
- If school contact information is correct, check your school's email or security system to make sure correspondence sent by **DoNotReply@cod.ed.gov** is not blocked or blacklisted. Also verify that attachments sent from this address is not blocked or removed. Users should work with the IT department to determine if this is the case and remove these two IP addresses (65.202.126.18 and 152.180.16.18) from the blacklist or blocked emails or add them to the safe sender list (whitelist).

4. How do schools view data on the COD website?

The COD System has the capacity to process records for multiple open award years simultaneously. Schools and third-party servicers can access the **COD website** and view specific award year data by selecting the desired award year from the dropdown box. The available award years open for processing can vary by program.

The default award year on the COD website changes every spring when the new award year is implemented in the COD System. When using the COD website in the spring, schools should verify they are processing in the correct award year to avoid errors and award rejects.

Note: The default award year will be the most recent open award year on all **COD website** screens except the Request Reopen/Extended Processing screen (The Request Reopen/Extended Processing screen defaults to the award year for which processing has most recently ended or most recent open award year that has been confirmed closed out (Balance Confirmation).

5. How often is Direct Loan, Pell Grant, and/or TEACH Grant disbursement information updated on the COD website?

Disbursement information is updated on the **COD website** after a school's batch is processed. However, the reflection of the actual disbursements in the school's disbursement totals (for example, Net Accepted and Posted Disbursements and Net Accepted and Posted Disbursements Applied) will not be reflected on the **COD website** until after the daily COD System's processing/posting has been completed. Generally, schools will see updated information reflected on the next business day.

6. How are Direct PLUS Loan credit checks initiated?

Direct PLUS Loan credit checks can be initiated three ways.

- 1. Federal Student Aid performs a credit check when a Direct PLUS Loan origination is received, and a credit check has not been performed within the last 180 days.
- 2. An applicant can complete a Direct PLUS Loan Request on StudentAid.gov. The credit check is a required step of the Direct PLUS Loan Request process.
- 3. Schools can perform a credit check by accessing the **COD website** Credit Check Search screen located under the Person tab. Enter the required borrower and/or student information. Click "Request Credit Check." This will run an instant credit check on the borrower which will return an immediate result of approved or declined. **Note:** This option should only be used as a last resort when the first two options are not feasible.

Note: Occasionally the credit decision result may be a pending status. This means that the borrower's information (Name, SSN, and/or Date of Birth (DOB)) does not match what the credit bureau holds on file. If this happens, verify that the Name, SSN and DOB entered for the borrower are correct. If not, resubmit the credit check or an updated origination record with the borrower's correct information. If it is correct, contact the FSA Partner and School Relations Center so that a representative can open a case to resolve the pending status. Depending on the reason for the pending credit check status, the representative will require a Social Security card and/or Driver's License for documentation to verify the data.

Sending/Receiving Data in the COD Environment

1. Will the COD System process batches that contain improper XML formats?

No. Batches submitted to the COD System containing improper Extensible Markup Language (XML) formats will not be processed or displayed on the **COD website**. The FSA Partner and School Relations

Center notifies the school that the batch was not processed and provides the school with the reason and action required to correct the batch.

2. Where can schools find information on message classes used for sending and receiving records to and from the COD System?

The complete list of message classes is available under Volume 2, Section 2 in the COD Technical Reference.

3. Where can schools find information on State Code and Country Code values that are submitted in a Common Record document?

Schools should refer to the Volume 6, Section 3 of the COD Technical Reference for information on the appropriate State Code and Country Code values that are submitted on a Common Record document.

4. How can schools send and receive personally identifiable information (PII) data?

To improve security when sending sensitive data, schools MUST NOT SEND PII data via email unless it is encrypted. Whenever possible, schools should upload sensitive data through the "File Share & Messages" page.

Federal Student Aid shares student-specific information through uploaded files via the COD website. The FSA Partner and School Relations Center uploads these files to the File Share section of the "File Share & Messages" page.

Authorized school users can view and download the customized documents from the COD website. Once a user is signed in to the COD website, a user will not be required to input any additional passwords to view a File Share document. The FSA Partner and School Relations Center uses email to notify schools of issues that require action, and that associated documents are ready for view or download, but no longer emails the password-protected files themselves.

5. How are batches acknowledged by the COD System?

When a school submits data through batches via SAIG, the COD System responds to each school's data submission files with a response that indicates what data was accepted and what data was rejected. All schools must send and receive origination and disbursement data for the Direct Loan, Pell Grant, and TEACH Grant programs to the COD System using the XML Common Record Layout.

When a school submits data for the Direct Loan, Iraq and Afghanistan Service Grant, Pell Grant, and TEACH Grant programs via the **COD website**, the option is available to receive a response via the school's SAIG mailbox. Schools will not receive a response for web-based transactions unless they have requested to receive web responses under the **COD website's** School Options Information screen.

Detailed information regarding the XML Schema versions used for Common Record documents is available in Volume 2, Section 3 in the COD Technical Reference or in the **COD Common Record XML Schema**.

Note: Even if a school opts to receive web responses, some software vendors cannot process or import them. A school should consult with its vendor.

6. Where can schools and third-party servicers view information on a batch submitted to the COD System?

Schools and third-party servicers can view information on a batch submitted to the COD System by accessing the **COD website's** Batch Detail Information screen (located under the "Batch" tab.) The Batch Detail Information screen displays batch statistics and the status of all records in the batch.

Schools and third-party servicers can also view the actual data they submitted to the COD System by accessing the Record Information screen. In addition, the response sent from the COD System can be viewed by accessing the Response Information screen.

To access the Record Information screen:

• Click on the Accepted link under the SSN, Award No, or Disb No columns on the Batch Detail Information screen. The Record Information screen displays.

OR

- Click on the Rejected or Accepted with corrections link under the SSN, Award No, or Disb No columns on the Batch Detail Information screen. The Record Errors screen displays.
- From the Record Errors screen, click on the View Record button at the bottom of the page to view the data submitted to the COD System.

To access the Response Information screen:

- Click on the Accepted link under the SSN, Award No, or Disb No column on the Batch Detail Information screen. The Record Information screen displays.
- From the Record Information screen, click on the View Response button at the bottom of the page. The Response Information screen displays.

OR

• Click on the Rejected or Accepted with corrections link under the SSN, Award No, or Disb No column on the Batch Detail Information screen. The Record Errors screen displays. From the Record Errors screen, click on the View Response button at the bottom of the page to view the response the COD System sent.

Note: Search results can be downloaded in CSV format on most COD web searches. A user can click on the "Export Results to CSV" icon to have search results downloaded.

7. How do I correct data in the COD System?

Schools can make individual student data corrections by submitting the changed data elements (along with other required fields) via batch processing. Schools are also able to make individual student data corrections online through the **COD website** but do not receive responses for web-based activities unless they have requested the option on the **COD website** School Options Information screen.

Additional information on correcting data is available in the COD Technical Reference: Volume 2, Section 1-Implementation Guide.

8. How do I inactivate (or cancel) a Direct Loan in the COD System?

A Direct Loan is inactivated by reducing the disbursements and the award to \$0. **Note:** When inactivating a loan that has accepted actual disbursements, the disbursements must first be reduced to \$0 (and accepted and processed by the COD System) before the loan amount can be reduced to \$0. The reduction can be submitted via Common Record batch or via the **COD website**.

A school can "reactivate" the loan by submitting a new loan amount and disbursement dates and amounts. When reactivating a loan, the school may also change any other fields necessary.

9. When and how often does the COD System process funding level adjustments?

The COD System processes and sends funding level adjustments to G6 twice a day: 10 a.m. ET and 10 p.m. ET to have a funding level adjustment reflected in G6 on the same day, a school must submit disbursement records to the COD System before 10 a.m. ET. Otherwise, the adjustment will post in G6

the next day. The time frame between submitting disbursement records to the COD System and posting in G6 is generally 24 hours.

Promissory Notes

1. Where do schools send paper MPNs and manifests for all award years?

Paper MPNs and MPN manifests for all award years should be mailed to Fairfax, Virginia for processing. There are two separate mailing addresses, depending on how you choose to send the MPNs. Use the correct address below to ensure timely receipt of the by the processing center.

Regular Mail should be sent to:

U.S. Department of Education P.O. Box 1130 Fairfax, VA 22038 **Overnight, Express, or Certified Mail should be sent to:** U.S. Department of Education 4050 Legato Road, #1100 Fairfax, VA 22033

2. How can I check on the status of a student's or parent's MPN?

Schools can check on the status of a student's or parent's MPN through the **COD website**. After logging into the COD website, schools can click on the 'Person' tab in the blue bar located on the top of the screen. From the Person Search screen, schools can then click on the "MPN/ATS/Manifest" link along the left-hand side. On the MPN/ATS/Manifest Search screen, five different searches can be conducted. Schools can search by the borrower's SSN, MPN ID, First and Last Name, Name and DOB, or by a Date Range. The Name search will return only linked MPNs, the Name and DOB search will only return unlinked (pending) MPNs. The Date Range search returns all linked and unlinked MPNs for a specified school and date range. Schools also have the option to view a PDF file of any MPNs that were completed electronically through StudentAid.gov.

COD Student Identifiers & FPS Matching

1. What person information is used to establish a student on the COD System?

A student is established on the COD System once required "person" information is successfully matched to identifying information on the FAFSA Processing System (FPS). For a Pell Grant, or TEACH Grant, the student's SSN, DOB, and first two letters of his or her Last Name are compared to FPS data. For a Direct Subsidized, Direct Unsubsidized, or Direct PLUS loan, the student's SSN and DOB are compared to FPS and credit bureau data. If the match is successful, the student is established on the COD System with the COD Student Identifier. The COD Student Identifier consists of the current SSN, DOB, and current Last Name.

2. Which student identifiers does the COD System match against the FPS?

In addition to comparing student data to FPS to establish a student on the COD System (see previous question), a second match is performed when establishing awards on the COD System. For this match, the FPS Transaction Number submitted with the award is used to pull data elements from FPS.

Note: Parent or borrower data is not matched against data from the FPS.

Refer to the COD Technical Reference: Volume 2, Section 1-Implementation Guide for complete identifier and matching criteria.

3. How do schools and third-party servicers change student identifiers on the FPS and COD System?

To change student information on the FPS, the school or student must submit a correction to the ISIR/FAFSA Submission Summary (this will result in a new transaction in FPS). After the correction has been submitted to the FPS, the school must send the changed data to the COD System reporting the old student information and the new student information (SSN, DOB, or Last Name) along with the new FPS transaction number. The COD System stores ONLY one set of student identifiers for each student.

4. Where can schools view a student's FPS information?

Schools may access the **COD website's** Applicant search screen to view abbreviated student information received from FPS. Schools can only view student data associated with their school.

Additionally, schools can view ISIR data the FPS has for students via **FAFSA Partner Portal**. If you do not have access to the site, the Destination Point Administrator (DPA) for your TG number can register you as a user. Your DPA should go to the **SAIG Enrollment site** and select "ENROLL FAA USERS FOR ONLINE SERVICES" to enroll people as FAA Users. All FAA Users will receive a PIN, which is required for access to the **FAFSA Partner Portal**.

Keep in mind that student identifiers such as Social Security Number, last name, and/or date of birth **cannot** be updated online. Updates to student identifiers can be made by the school creating an electronic ISIR correction or by the student submitting a corrected paper FAFSA Submission Summary. If you have any questions about the **FAFSA Partner Portal** website, contact FPS/SAIG Technical Support at 1-800-330-5947 or by email at **Support@fps.ed.gov**.

5. Which data elements are pulled from FPS?

The COD System determines if certain data elements are transmitted in Common Records or already exist for the student and award year on the COD System. If neither is true, the COD System will 'pull' these data elements from information provided by the FPS.

For any award type, the following data elements are pulled from the FPS information when absent on both the record and the COD System: First name, address, Loan default/Grant overpayment for student, and citizenship status. **Note:** Citizenship status cannot be pulled from the FPS for Direct PLUS loans and, therefore, is required on records for Direct PLUS loans.

For Pell Grant awards, the COD System will always pull the following data elements: Student Aid Index (SAI), Max Pell Indicator, Minimum Pell Indicator, Pell Eligibility flag, Iraq Afghanistan Service Grant Indicator, Children of Fallen Heroes Indicator, and Verification Selection.

COD Data Edits

1. What resources can schools refer to for information regarding edits?

Schools can refer to the COD Technical Reference: Volume 2 & Volume 3, Section 4. Schools can also access the **COD website's** Help link for information on edits.

Reconciliation

1. What is reconciliation?

Reconciliation is the process by which a school reviews and compares *Title IV* aid (grants, loans, and campus-based aid) recorded on the Department's systems (COD/G6) with the information in the

school's internal records (both Financial Aid and Business Office). Through reconciliation, disbursement and cash discrepancies are identified and resolved in a timely manner to ensure the school meets all regulatory requirements. For the Direct Loan and Campus-Based programs, schools must reconcile at least monthly to meet regulatory requirements. For all other *Title IV* Programs, it is highly suggested that schools reconcile at least monthly. Schools must also meet all cash management and disbursement/adjustment reporting requirements.

Regular reconciliation can help identify and resolve discrepancies so schools can stay in compliance. At a minimum, a school should reconcile its Federal Student Aid financial records monthly (It is a regulatory requirement for Direct Loans and Campus-Based programs to do this at least monthly). However, the more frequently a school performs reconciliation, the more likely they will be able to identify issues and resolve discrepancies before they become part of a systemic problem. Frequent reconciliation is an important internal control procedure that can make a significant contribution to increasing the overall program integrity of the Federal Student Aid programs at a school. In addition, schools that have systems in place to compare and identify discrepancies between their internal records and data from the Department reports will find that the monthly reconciliation is much easier and makes the closeout process less time consuming.

2. What assistance does the FSA Partner and School Relations Center provide for reconciliation?

The FSA Partner and School Relations Center takes a proactive approach in assisting schools with monitoring cash balances, the substantiation of funds, and the reporting of disbursements within the required timeframe by performing outreach to schools. CSRs as well as Federal Student Aid staff monitor reporting and drawdown activities and work with schools to prevent and resolve potential reconciliation issues. COD also has COD Reconciliation Coordinators that can assist schools with specific reconciliation questions and do outreach to schools.

3. What reconciliation tools does the COD website offer?

The **COD** website provides several reconciliation tools. Financial aid offices and business offices can both use various financial screens to view drawdown and reporting activity as well as the data the COD System uses to "age" and "substantiate" the funds drawn. The following screens use various financial screens to assist in the reconciliation process:

- School Funding Information: provides users with information on a school's net drawdowns, total accepted and posted disbursements Cash > Net Accepted and Posted Disbursements, and information schools may use to determine the amount of available funds. This screen reflects the most current financial information since it is updated twice daily.
- School Summary Financial Information: allows users to view a summary of a school's Pell Grant, TEACH Grant, IASG (2023–24 and prior), and Direct Loan financial information. For Direct Loan and TEACH, this screen mirrors the School Account Statement (SAS) Cash Summary and can be used to verify balances between receipt of monthly SAS reports.
- **Cash Activity:** provides users with information on all drawdowns and refund of cash transactions for a particular school. This information can be used to assist in reconciling your internal cash transactions to transactions posted in the COD System from G6. This screen also provides the Days Left For On-time Reporting which allows schools to proactively monitor when they may be approaching unsubstantiated cash > 30 days.
- **Yearly Totals:** screen provides users with information regarding a school's total awards, total amount disbursed, and the total number of unduplicated recipients by program and sub-program for the selected award year. This can be compared with summary totals from your school's internal systems (both Financial Aid and Business Office).

4. What are the most useful COD reports that can be used for reconciliation?

There are Direct Loan, Pell Grant, and TEACH Grant reports available to assist schools with their reconciliation processes. The COD System sends reports to schools' SAIG mailboxes, allows schools to view reports on the **COD website**, and fulfills requests for reports via the **COD website** and/or batch process. These reports include:

- Direct Loan School Account Statement (SAS)
- Pell Grant School Account Statement
- TEACH Grant School Account Statement
- Direct Loan, Pell Grant, or TEACH Grant School Account Statement Disbursement Detail on Demand
- Pell Grant Reconciliation File
- Pell Grant Year-to-Date Record

Note: The SAS is your primary (required) tool for regular reconciliation for the Pell Grant, Direct Loan and TEACH Grant programs. The Direct Loan, Pell Grant, and TEACH Grant SASs are automatically generated and sent to schools via SAIG monthly and contain the Department's official Ending Cash Balance for the school, program, and award year. These files should be used in conjunction with regular or, required monthly reconciliation for these programs.

A description of each of these reports and files is included below. More information on reports is available in the COD Technical Reference: Volume 6, Section 6-COD Reports.

Direct Loan School Account Statement

The Direct Loan SAS is a monthly statement, similar to a bank statement, which summarizes the school's processing activity for each month. The SAS is the school's primary tool used in required monthly reconciliation and program year closeout and should be compared to both financial aid and business office records. This report provides the Department's official ending cash balance as of the end date of the report, based on data submitted by the school. As such, all schools are required to receive the SAS monthly until they have officially closed out a program year. The Direct Loan SAS report is automatically sent monthly to the school's SAIG mailbox. The report is available in a variety of formats and options. This report can be imported into a system or Direct Loan Tools (a Department software application available on the **Knowledge Center**, which will soon be combined with EDExpress) and then used to compare with the school's records. For more information on Direct Loan Tools, see question 6, below.

Pell Grant School Account Statement

The Pell Grant SAS is a monthly statement, similar to a bank statement, which summarizes a school's Pell Grant processing activity for each month. The Pell Grant SAS is a school's primary tool used in regular reconciliation and should be compared to both financial aid and business office records. This file provides the Department's official ending cash balance as of the end date of the file, based on data submitted by a school. As such, all schools with cash or disbursement activity within the award year will receive the Pell Grant SAS automatically monthly via the school's SAIG mailbox. The Pell Grant SAS is available in a Comma-Delimited with Header format in monthly, Year-to-Date, or both report type. This report can be imported into a system or the Pell Grant module in EDExpress (a Department software application available on the **Knowledge Center**) and then used to compare with the school's records.

TEACH Grant School Account Statement

The TEACH Grant SAS is a monthly statement, similar to a bank statement, which summarizes a school's TEACH Grant processing activity for each month. The TEACH Grant SAS is a school's primary tool used

in regular reconciliation and should be compared to both financial aid and business office records. This file provides the Department's official ending cash balance as of the end date of the file, based on data submitted by a school. As such, all schools with cash or disbursement activity within the award year will receive the TEACH Grant SAS automatically on a monthly basis via the school's SAIG mailbox. The TEACH Grant SAS is available in a Comma-Delimited with Header format either in monthly, Year-to-Date, or both report type.

Note: Schools can update their Direct Loan, Pell Grant, and TEACH Grant SAS report options on the **COD website**. Once logged into the **COD website**, under the School tab (and after entering school identifiers), click on the "Report Selection" link located on the bottom left-hand side. Choose "Modify SAS Options". Make any necessary adjustments to your report options and click 'Submit' to save. The report will not reflect the new options until the next month's SAS report is sent.

The remaining reports listed are available to schools by request. These optional reports and files can provide additional data to be used in the reconciliation process for each program.

Direct Loan, Pell Grant, or TEACH Grant School Account Statement Disbursement Detail on Demand

The Direct Loan, Pell Grant, and/or TEACH Grant SAS Disbursement Detail On Demand may be requested on an as-needed basis, in between receipt of the full monthly SAS files, and can aid in further reconciliation of disbursement transaction data. This file provides all detail-level disbursement transactions only (no cash detail or cash or loan summary information is included). The file can be requested via the New Report Requests page under the Batch tab on the **COD website**, and the user is prompted to input format and content options at the time of the request. The information can be requested in a variety of formats (fixed length and/or comma-delimited with headers depending on program), as well as for a specific month-to-date, year-to-date, or date range period, and is delivered via the school's SAIG mailbox.

Pell Grant Reconciliation Report

The Pell Grant Reconciliation Report is a one-record student summary of processed records and can be helpful to a school as it completes both the year-end and ongoing reconciliation processes. This report can be downloaded, printed, or imported into a spreadsheet for comparison with your school's disbursement data. This report provides the total YTD disbursement amount per student as it is in the COD System. It may be requested by the school via batch data request or via the Report Requests page on the **COD website** and is provided in a fixed-length, flat file format.

Pell Grant Year-to-Date Record

The Pell Grant Year-to-Date (YTD) Record provides detailed award and disbursement data at a transaction level for one given student or for all Pell Grant recipients at the school. The Year-to-Date Record shows the number of recipients at the school; the number of award and disbursement records that were accepted, corrected, and rejected; and, for certain edit codes, the number of times a school received that specific edit code on a response document. The Year-to-Date Record can be used to replace a corrupt database or to reconcile records with accepted data on the COD System. The Year-to-Date can be requested via batch data request or via the Report Requests page on the **COD website**, and is provided in a fixed-length, flat file format.

Report Readers

A school that does not already have a process in place for using the Pell Grant Reconciliation File, Pell Grant YTD File, and/or SAS Disbursement Detail on Demand File should consider downloading the corresponding report readers. The readers provide a simplified way of importing the report files into an Excel spreadsheet for school reconciliation purposes.

The readers, along with instructions on how to use them, are posted on the **COD website** and can be accessed by clicking on the "COD Resources" link located on the gray bar at the bottom of the home page.

5. What if I need information that is not available in the standard reports I receive?

The FSA Partner and School Relations Center can create customized reports (Ad hoc report) when the standard reports do not provide needed information. Schools should contact the FSA Partner and School Relations Center for assistance.

6. What is EDExpress?

EDExpress has functionality designed to assist Direct Loan schools with formatting the School Account Statement (SAS) report and electronically compare loans and actual disbursements listed on the report to those recorded in EDExpress or an external file. EDExpress tracks cash transactions (drawdowns and returns of cash) and compares them against cash transactions listed on the SAS report. It also has a Rebuild utility which can be used by EDExpress schools to rebuild lost or corrupted loan/disbursement data. EDExpress for Windows can be downloaded from the **Knowledge Center**.

7. When should a school balance to a zero Cash > Net Accepted and Posted Disbursements balance and complete final reconciliation?

A final reconciliation should be performed as soon as possible after your school's final scheduled disbursements have been made for the award year. This process must be performed within the applicable data submission deadline, as well as immediately following processing of any additional data by the school (for example, disbursement adjustments made within regulatory timeframes, but which occur after the data submission deadline as well as returns of unclaimed credit balance checks; see Federal Student Aid Handbook, Volume 4, Chapters 5, and 6).

Schools are encouraged to confirm closeout via the School Balance Confirmation page on the COD website by completing the School Balance Confirmation form. Balance confirmation will allow your school to receive a Program Year Closeout Letter to document completion of final reconciliation. It also provides tighter controls over available funding and data submission.

Note: Schools can see additional Balance Confirmation information via the FSA Partner Connect website School Dashboard under the School Notification section. This section will notify your school of balance confirmations needed for closed programs and award years and balance confirmations recently completed.

8. What if I need extended processing to process records in the COD website after the data submission (closeout) deadline?

Extended processing is not needed to submit downward award or disbursement transaction changes, non-financial changes, or upward changes due to POP. If you need to submit increases to award or disbursement or new disbursements after the data submission (closeout) deadline, you will need to request an extension to the deadline via the COD website Request Reopen/Extended Processing page. However, you should not submit a request until after you have completed reconciliation of all program records and are ready to submit increases or new award or disbursement data to the COD website.

Note: You must submit a separate request for each award year for which extended processing is needed.

Pell Grant Potential Overaward Process (POP)

1. What is the Potential Overaward Process (POP)?

The Potential Overaward Process (POP) addresses the situation in which a Pell Grant award has been disbursed by multiple schools and causes the student to exceed 100% of his or her Scheduled Pell Grant award. **Note:** The POP limit is 150% of the Scheduled Pell Grant award if the Additional Eligibility Indicator (AEI) has been set to "True." COD System Common Record responses alert a school to a POP condition through disbursement warning Edit 068. The COD System sends a weekly Pell POP Report to schools that have accepted actual disbursement for students that are in or have been in a POP situation for the award year.

When a POP situation occurs, Federal Student Aid will notify all schools involved via a Multiple Reporting Record (MRR), message class PGMRxxOP. Schools must research the student's status, confirm eligibility, and reduce disbursements that should not have been made. The COD System will allow the overaward to exist for 30 days while schools work together to resolve the issue.

If schools do not reconcile POP situations within 30 days, Federal Student Aid will generate a "Negative Disbursement" and reduce ALL disbursements to zero (\$0.00) at all involved schools. The eligible school may resubmit actual disbursement data to reinstate the student's award. If multiple schools resubmit disbursements, causing an overpaid status again, Federal Student Aid will send another MRR to all schools involved. To avoid this cyclic situation, schools are required to collaborate with the corresponding POP affected school(s) and correct the overpayment situation.

Information regarding the business rules pertaining to POP situations is available in the COD Technical Reference: Volume 2 & Volume 3, Section 1-Implementation Guide.

2. What can schools do to prevent a POP condition from occurring?

Schools should enroll the transfer student in the National Student Loan Data System (NSLDS®) Transfer Student Monitoring Process. Once a student is enrolled, NSLDS alerts schools to any Pell Grant disbursements made on the student or other changes that could affect the student's eligibility for *Title IV* student aid.

Schools can also review the **COD website's** Person Pell Information screen to check the Pell Grant Eligibility Used for the student. A school can also confirm that the AEI is appropriately set for the student. To view this information, schools will need to perform a person search on the Person Search screen using the student's SSN and then click on the Pell link.

3. What should a school do if all attempts to work with the corresponding POP school have failed?

Federal Student Aid understands that mediation between schools may be difficult at times. When the required mediation has failed and the same school(s) continues to submit disbursement records for the same student, schools may contact the FSA Partner and School Relations Center. Customer service representatives are available to assist in mediating and escalating POP issues to the Federal Student Aid's Grants Division area for examination of both school's Pell Grant processes and resolution.