150% Subsidized Limitation
- COD Processing

SUNYFAP
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Agenda

- 150% Subsidized Loan Limitation - Basics
- Reporting Loan Periods and Academic Years
- Phase 1 – Identifying who is Impacted
- Electronic Announcements
- Phase 2 – Enforcing Limitation
  - Reports
  - Web pages
  - COD Technical Reference
  - EDExpress
  - COD Testing
- Resources
150% Subsidized Loan Limitation

- Limits the length of time a borrower can be enrolled in school and be eligible for new subsidized loans or keep their loans subsidized

- Key concepts:
  - “length of time”
  - “enrolled”
  - two eligibility concepts: subsidized loans, loan subsidy

- Not a new limit on the amount of subsidized loans a borrower can receive
150% Limitation – Terms & Concepts

- SULA
- First-time borrower
- Maximum Eligibility Period (MEP)
- Subsidized Usage Periods (SUPs)
- Remaining Eligibility Period (REP)
- Schema
- Tags
- Calculations
- COD – system of record: loan records
- NSLDS – system of record: enrollment reporting
SULA – Subsidized Usage Limit Applies

First-time borrower- Any borrower who had no balance on a DL/FFEL student loan on 7/1/2013 or afterwards at the time they obtain a loan

Maximum Eligibility Period (MEP) – Set at 1.5X the published length of the program the borrower is enrolled in

Subsidized Usage Periods (SUPs) – Measured in years, the amount of subsidized loan usage the borrower has used

Remaining Eligibility Period (REP) – The borrower’s remaining eligibility for subsidized loans:

\[ \text{MEP} - \sum \text{SUPs} = \text{REP} \]
Reporting of Loan Periods, Academic Years

- Dear Colleague Letter GEN-13-13
- Posted on IFAP – 5/10/2013
- Webinars conducted on 6/4 and 6/6/2013

- Critical to the implementation of the 150% Direct Subsidized Loan time-limit is the proper reporting of loan period and academic year dates
- For 2013/2014 and forward, all loan types, all borrowers
- Schools must update these dates if the actual attendance differed from the anticipated
- Loan periods should include only those terms/payment periods in which the borrower receives funds
Loan Period Reporting – why updating matters

Example

Fall: 9/10/2014 – 12/10/2014
Spring: 1/10/2015 – 5/10/2015

School originates a fall-spring loan
Scheduled Academic Year, summer is a trailer but no loan for summer
Subsidized Usage Period will be calculated at:

#Days in Loan Period / #Days in Academic Year = 242/242 = 1.0 Years

But borrower doesn’t end up receiving the spring term disbursement
School needs to update the loan period to include only fall term dates

#Days in Loan Period / #Days in Academic Year = 91/242 = 0.4 Years
COD Action Queue

These are pending disbursements of loans COD has accepted.

This is a good place to check on occasion to see if unused disbursements also indicate loan periods which haven’t been updated.

Batch Search Tab
Action Queue List

Non-zero amount
Past date
Identify first-time borrowers who are subject to the 150% Subsidized loan limitation
150% Limitation – Phase 1

- COD system implementation of 6/28/2013 (Release 12.2)
  - COD evaluates borrowers for the new Subsidized Usage Limit Applies (SULA) Flag
  - Flag set if the borrower has no outstanding loan balance at the time he/she receives a Direct Loan with an earliest disbursement date after June 30, 2013
  - Schools need to supplement entrance counseling to include 150% Subsidized Usage Limit information for borrowers who already completed entrance counseling and who would be subject to SULA until this release added it
  - Entrance Counseling enhanced for 150% Direct Subsidized Loan eligibility
Electronic Announcements

1. **5/16/2013** – Interim Final Regulations Published
2. **6/20/2013** - Phase One of COD System Changes Scheduled for June 28-30, 2013
3. **8/30/2013** - Prorating Subsidized Usage Periods Based on Enrollment Status for the 2013-2014 Year
4. **10/25/2013** - Tracking Teacher Certification Programs for the 2013-2014 Direct Loan Processing Year
5. **11/12/2013** - Limited School Calculation of Remaining Eligibility
7. **12/20/2013** - Establishment of IFAP Information Page and First Set of FAQs
8. **1/17/2014** - Final Regulations Published
10. **2/28/2014** – Ad hoc Reporting of Non-Cred. Teacher Certif. Programs
11. **3/10/2014** – Updated Worksheet for Short-Term Program Calculations
150% Limitation – Electronic Announcement #1

- Posted 5/16/2013

“Interim Final Regulations Published”

- Limits eligibility of first-time borrowers for Subsidized loans to 150% of published length of program borrower is currently enrolled in

- Under certain conditions causes borrowers to lose subsidy on loans already received

- ED responsible for computing MEP, SUP, REP

- Schools responsible for
  - Correctly reporting loan periods and academic years
  - Provide enhanced entrance counseling
  - Enhanced reporting
150% Limitation – Electronic Announcement #2

- Posted 6/20/2013
- “Phase One of COD System Changes Scheduled for June 28-30, 2013”

Phase 1 changes to COD
  - Implemented 6/30/2013
  - Identify first-time borrowers who are subject to 150% limitation
  - Subsidized Usage Limit Applies report
150% Limitation – Electronic Announcement #3

- Posted 8/30/2013
- “Prorating Subsidized Usage Periods Based on Enrollment Status for the 2013-2014 Year”
- Proration required if enrollment less than full-time
- Will need enrollment status when the disbursement was received: full-time, three-quarter-time, half-time
- But for 2013/2014 three-quarter-time was not reported
- No ad hoc reporting needed, will use what we have
- If any portion of the loan period the enrollment status was at least half-time but less than full-time
- We will calculate the Subsidized Usage Period as half-time
Posted 10/25/2013

“Tracking Teacher Certification Programs for the 2013-2014 Direct Loan Processing Year”

Special reporting needed from schools in certain situations

Borrower enrolled in a program necessary for professional credential or certification from the state that is required for employment

Regulations require separate Maximum Eligibility Period tracking

Enhanced reporting will enable us to do so for 2014/2015

But for 2013/2014 we will need a **Teacher Certification Program ad hoc file**
150% Limitation – Electronic Announcement #5

- Posted 11/12/2013
- “Limited School Calculation of Remaining Eligibility”
- Beginning 2014/2015 COD will receive all necessary data to monitor Subsidized usage
- But for very short program in 2013/2014 a borrower could lose their eligibility
  - Designated a first-time borrower
  - Received a 2013/2014 subsidized loan
  - Program is shorter than 15 weeks, 10 months, or 40 weeks
- Excel worksheet provided with EA so schools do not award additional subsidized loans to ineligible borrowers
150% Limitation – Electronic Announcement #6

- Posted 11/25/2013
- “Availability of new NSLDS Enrollment Report File Layouts (DRAFTS)”
- Loss of interest subsidy based on borrower’s enrollment, not whether borrower applied for or received Title IV aid
- Therefore, NSLDS collecting of full enrollment information at the program level is critical
- Schools may begin using new file lay-outs no earlier than 4/14/2014
- But must begin using new file lay-outs no later than 7/1/2014
150% Limitation – Electronic Announcement #7

- Posted 12/20/2013
- “Establishment of IFAP Information Page and First Set of FAQs”
  - Federal Register Notices including Regulations
  - Dear Colleague Letters and Electronic Announcements
  - Frequently Asked Questions
  - Training
  - Resources

150 Percent Direct Subsidized Loan Limit Information

On May 16, 2013, we published interim final regulations in the Federal Register implementing the Moving Ahead for Progress in the 21st Century Act (MAP-21) (Public Law 112-141) that added a new provision to the Direct Loan statutory requirements that limits a first-time borrower’s eligibility for Direct Subsidized Loans to a period not to exceed 150 percent of the length of the borrower’s educational program (“the 150% limit”). Under certain conditions, the provision also causes first-time borrowers who have exceeded the 150 percent limit to lose the interest subsidy on their Direct Subsidized Loans.

Please visit this page for information and updates as they become available.
Frequently Asked Questions

- First-Time Borrowers (4 Q&A’s)
- Maximum Eligibility Period (11 Q&A’s)
- Subsidized Usage Period (13 Q&A’s)
- Remaining Eligibility Period (3 Q&A’s)
- Loss of Eligibility (1 Q&A)
- Interest Subsidy (1Q&A)
- Entrance & Exit Counseling (1 Q&A)
- Preparatory Coursework (1 Q&A)
- Teacher Certification (1 Q&A)
- Notifications (3 Q&A’s)
- Other (4 Q&A’s)
- Academic Year and Loan Period Reporting (11Q&A’s)
First-Time Borrower – parent PLUS loans

FAQ: FTB-A2

Receipt by the parent of a PLUS loan would not impact whether the student for whom the parent receives the PLUS loan is or is not a first-time borrower.
Maximum Eligibility Period – multiple programs

FAQ: MEP-A2

If the borrower receives a loan to cover enrollment in more than one academic program at the same school, the borrower’s MEP will be calculated based on the published length of the longest program.

When submitting the origination record for the borrower’s Direct Loan to the COD System, the school should only report program information associated with the borrower’s longest program.

When reporting enrollment information to NSLDS, the school must report separate enrollments for each of the borrower’s programs.
FAQ: SUP-A2

If a student is simultaneously receiving two Subsidized loans from two different schools COD will prorate the loan period for each so that overlapping periods are counted only once.
FAQ: REP-A2

If a student has a REP that is less than the minimum length of a loan period the student cannot receive a Subsidized loan. But the school can originate an Unsubsidized loan for the full amount of the student’s eligibility.
FAQ: ELIG-A1

Even if a borrower still has eligibility remaining on his Direct Subsidized Loan limit, if he has reached his MEP he still loses eligibility for additional Subsidized loans. Depending on subsequent enrollment he may also lose interest subsidy on loans already received.
Interest Subsidy – enrolled in two programs

FAQ: INT-A1

A borrower has lost eligibility for additional Subsidized loans while enrolled in two different programs of differing lengths. How will ED determine loss of interest subsidy?

Schools report program-specific enrollment to NSLDS. If the enrollment dates for the shorter program are the same or completely within those of the longer program the determination for loss of interest subsidy will be based on the longer program.
Notifications – how borrowers will be notified

FAQ: NTF-A1

Beginning with 2014/2015 COD Release (Release 13.0) COD will notify borrowers through the normal disclosure process.

These will now include the Subsidized Usage Period associated with the loan, the total of the borrower’s SUPs, and the REP for enrollment in the borrower’s current program.
FAQ: OTH-A1

All other eligibility requirements continue to apply. 150% limitations and satisfactory academic progress apply separately to borrowers. If a student has failed to meet SAP then is no longer eligible for TIV aid, including Subsidized loans. If student has reached 150% limit but has not failed SAP then the student is not eligible for additional subsidized loans but she is for other forms of TIV aid.
FAQ: AYLP-A1

Only a payment period during which a student has received and kept Direct Loan funds should be included in a loan period. If a student did not receive Direct Loan funds for a payment period, for example, a semester, then the payment period must not be included in the loan period.
Academic Year Reporting - periods included

FAQ: AYLP-A2

The period to which the annual loan limit applies.

For standard-term programs and non-standard-term programs that have terms that are substantially equal to each other and are each at least nine weeks in length - must coincide with the calendar period of the school’s SAY or BBAY, whichever it is using to track annual loan limits for the student.

For non-term programs and non-standard-term programs that have terms that are not substantially equal to each other and are not each at least nine weeks in length - must coincide with the calendar period that it would take the student to complete both the number of weeks of instructional time and credit or clock hours in the school’s academic year.
FAQ: AYLP-A3

If summer is treated as a header or trailer.

Schools that do not require attendance in the summer term may not include the dates of the summer term in the Direct Loan’s academic year unless the student is attending the summer term and receiving a Direct Loan for that term.
Reporting Timeframes

FAQ: AYLP-A10

Timeframe for reporting to COD updates to loan periods or academic years.

Schools must update within 15 days of the date that the school became aware of the need to make an adjustment.

For non-term or clock hour programs or non-standard-term programs whose terms are not substantially equal to each other and are not each at least nine weeks in length, whose loan periods and academic years may need to be updated to account for students’ progression through the program, schools may delay reporting updates to loan periods and academic years until the student completes the period of enrollment for which the loan is intended or when the student withdraws.
Reporting When a Middle Term is Missed

FAQ: AYLP-A11

If student attends in the fall, does not attend in the winter, and then resumes at least half-time attendance in the spring.

Will require two loans. One loan will be fall-only loan period with fall-winter-spring academic year. One loan will be spring-only loan period with fall-winter-spring academic year.
Other FAQ’s for Acad. Year, Loan Period reporting

See IFAP for complete questions and answers

- Will all loan types have the same loan period and academic year dates?
- Should summer term dates be included in loan period for BBAY?
- What are the loan period and academic year dates to be reported for clock-hour programs?
- What academic year dates are to be reported when a student transfers in the middle of the academic year?
- How are loan periods and academic years reported for students in non-term and clock-hour programs who go on a leave of absence?
150% Limitation – Electronic Announcement #8

- Posted 1/17/2014
- “Final Regulations Published”
- Based on public comments
  1. Rounding Subsidized Usage Periods
  2. Interaction Between the Annual Loan Limit Exception and Proration of Subsidized Usage Periods Based on Part-Time Enrollment Status
  3. Maximum Eligibility Period for Bachelor’s Degree Completion Programs
  4. Maximum Eligibility Period for Special Admission Associate Degree Programs
1. Rounding Subsidized Usage Periods

*Rounding Subsidized Usage Periods*

- Subsidized Usage Period measured in academic years
  
  \[(SUP) = \frac{\text{# Days in Loan Period}}{\text{# Days in Academic Year}}\]

- Interim final regulations called for rounding down to nearest quarter of a year
- Final regulations call for rounding up or down to nearest tenth of a year
- If calculation = .45 years
  - *Was* rounded to 0.25 years, *no longer*
  - *Is* rounded to .50 year
2. Interaction Between Exceptions

Interaction Between the Annual Loan Limit Exception and Proration of Subsidized Usage Periods Based on Part-Time Enrollment Status

- Under interim final regulations there were 2 exceptions to Subsidized Usage Period (SUP) calculation:
  1. When borrower received full subsidized annual loan limit for a period of less than an academic year - a full 1.0 year usage was applied
  2. When borrower received subsidized loan while enrolled part-time the usage was prorated based on enrollment status
- When both present the annual loan limit exception trumped the part-time exception, *no longer*
- Under final regulations both will apply, first the annual loan limit exception, then the part-time exception
3. Special Program Indicator “B”

**Maximum Eligibility Period for Bachelor’s Degree Completion Programs**

- Interim regulations: Bachelor’s degrees that required an associate degree or two years postsecondary coursework for admission had a published program length of just 2 years – thus a MEP of 3 years.
- Final regulations: Schools should report a “Special Program Indictor” of “B” – and a program length of 4 years. MEP will then be 6 years.
4. Special Program Indictor “A”

Maximum Eligibility Period for Special Admission Associate Degree Programs

- A special admission associate degree program is an associate degree that:
  - Requires an associate degree or at least two years of postsecondary coursework as a prerequisite
  - Admits only a selected number of applicants based on additional competitive criteria
  - Provides academic qualifications necessary for a profession that requires State licensure or certification

- Interim regulations: Only a 2-year program thus MEP = 3 years.

- Final regulations: Schools should report a “Special Program Indictor” of “A” – and a program length of 4 years. MEP will then be 6 years.
150% Limitation – Electronic Announcement #9

- Posted 2/27/2014
- New NSLDS Enrollment Reporting File Layouts
  - Draft was released 11/25/2013
    - Fixed-width
    - CSV
- Changes to draft
150% Limitation – Electronic Announcement #10

- Posted 2/28/2014
- COD System Readiness for Reporting Non-Credential Teacher Certification Programs for 2013/2014 and Prior
- Ad hoc reporting
- Comma-delimited
- See also Electronic Announcement #4
- See 2014/2015 COD Technical Reference, Volume II, Section 1, starting on page 181
- For 2014/2015 and forward – reporting will be in the Common Record
150% Limitation – Electronic Announcement #11

- Posted 3/10/2014
- Update to worksheet used to calculate remaining eligibility for short-term programs
- See also Electronic Announcement #5
- Attachment
- For 2013/2014 loans
- For 2014/2015 and forward – reporting will be in the Common Record
150% Limitation

Enforce the 150% Subsidized loan limitation
150% Limitation – Phase 2

- COD system implementation of 4/11/2014 (Release 13.0)
  - Begin enforcing the 150% time limit for Direct Subsidized Loans
  - COD Common Record Schema and batch processing modifications
    - New schema input fields
    - New SULA edits
    - New response for SULA calculations
  - Reporting modifications
  - COD Web and DLOT to be updated to include the new SULA input and response tags
  - New SULA Request and SULA Information pages on COD Web
150% Limitation – New Schema Input Fields

In order to enforce the 150% subsidy limitation, the COD Common Record Schema will be updated to include new SULA related tags, for award year 2014/2015 and forward.

The new award block tags are valid for:
Direct Loan Subsidized, Unsubsidized and PLUS

Input Loan Info Award Block

- <PublishedPgmLengthYears>
- <PublishedPgmLengthWeeks>
- <PublishedPgmLengthMonths>
- <WeeksProgramsAcademicYear>
- <SpecialPrograms>
- <ProgramCredentialLevel>

The new disbursement block tags are valid for:
Direct Loan Subsidized, Unsubsidized, PLUS, and TEACH

Input Disbursement Block

- <PaymentPeriodStartDate>
- <EnrollmentStatus>
- <ProgramCIPCode>
150% Subsidy limitation: The new `<SpecialPrograms>` tag will assist in validating the type and length of program.

<table>
<thead>
<tr>
<th>Value</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>P</td>
<td>Preparatory Coursework Graduate Professional Program</td>
</tr>
<tr>
<td>U</td>
<td>Preparatory Coursework Undergraduate Program</td>
</tr>
<tr>
<td>T</td>
<td>Non-Credential Teacher Certification Program</td>
</tr>
<tr>
<td>A</td>
<td>Bachelor’s Degree Completion Program</td>
</tr>
<tr>
<td>B</td>
<td>Special Admission Associate Degree Program</td>
</tr>
<tr>
<td>N</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>
150% Limitation – *Grade Level Validation*

150% Subsidy limitation: COD will validate the `<SpecialPrograms>` tag in conjunction with the Grade Level (GL) field on a Direct Loan origination. Below are examples of validation:

<table>
<thead>
<tr>
<th>Special Programs</th>
<th>Tag Value</th>
<th>Valid Grade Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prep Grad</td>
<td>P</td>
<td>5</td>
</tr>
<tr>
<td>Prep Undergrad</td>
<td>U</td>
<td>1, 0</td>
</tr>
<tr>
<td>Teacher Cert</td>
<td>T</td>
<td>5</td>
</tr>
<tr>
<td>Special Admin. Assoc.</td>
<td>A</td>
<td>TBD</td>
</tr>
<tr>
<td>Bachelor’s Completion</td>
<td>B</td>
<td>TBD</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>N</td>
<td>No GL validation</td>
</tr>
<tr>
<td>Tag Not Submitted</td>
<td>N/A</td>
<td>No GL validation</td>
</tr>
</tbody>
</table>
150% Limitation – *Program Credential Level*

150% limitation: the new `<ProgramCredentialLevel>` tag will assist in validating the type and length of program.

<table>
<thead>
<tr>
<th>Description</th>
<th>Program Credential Level</th>
<th>Student Level Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undergraduate certificate or diploma</td>
<td>01</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Associate’s degree</td>
<td>02</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Bachelor’s degree</td>
<td>03</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Post Baccalaureate certificate</td>
<td>04</td>
<td>0-5 (Undergraduate)</td>
</tr>
<tr>
<td>Master’s degree</td>
<td>05</td>
<td>0-7 (U and G)</td>
</tr>
<tr>
<td>Doctoral degree</td>
<td>06</td>
<td>0-7 (U and G)</td>
</tr>
<tr>
<td>First Professional degree</td>
<td>07</td>
<td>0-7 (U and G)</td>
</tr>
<tr>
<td>Graduate/Professional certificate</td>
<td>08</td>
<td>0-7 (U and G)</td>
</tr>
<tr>
<td>Non-credential programs</td>
<td>99</td>
<td>0-5 (Undergraduate)</td>
</tr>
</tbody>
</table>

*(preparatory coursework/teacher certification)
150% Limitation – Award Level Edits

150% Subsidy limitation: new award record edits will be introduced with the updated COD Common Record schema.

<table>
<thead>
<tr>
<th>Edit</th>
<th>Program</th>
<th>Trigger</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reject 202</td>
<td>DL</td>
<td>Cannot submit more than one tag for Published Program Length (Years, Months or Weeks)</td>
</tr>
<tr>
<td>Reject 203</td>
<td>DL</td>
<td>Incorrect Special Program submitted</td>
</tr>
<tr>
<td>Reject 206</td>
<td>DL Sub</td>
<td>Remaining Subsidized Eligibility Period is less than zero for this award</td>
</tr>
<tr>
<td>Warning 207</td>
<td>DL Sub</td>
<td>Maintenance to this tag may have caused the Remaining Subsidized Eligibility Period to drop below zero for this award</td>
</tr>
<tr>
<td>Reject 208</td>
<td>DL</td>
<td>Incorrect Student Level Code submitted</td>
</tr>
<tr>
<td>Reject 209</td>
<td>DL</td>
<td>Invalid value submitted for Weeks Programs Academic Year</td>
</tr>
</tbody>
</table>

Note: “Maintenance record” and “Change record” are synonymous
150% Limitation – *Disbursement Level Edits*

150% Subsidy limitation: new disbursement record edits will be introduced with the updated COD Common Record schema.

<table>
<thead>
<tr>
<th>Edit</th>
<th>Program</th>
<th>Trigger</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reject 204</td>
<td>DL &amp; TEACH</td>
<td>Incorrect Program CIP Code submitted</td>
</tr>
<tr>
<td>Reject 205</td>
<td>DL</td>
<td>Payment Period Start Date is outside the Award Begin and End dates</td>
</tr>
<tr>
<td>Reject 207</td>
<td>DL Sub</td>
<td>For HCM/Reimbursement schools, sequence issues</td>
</tr>
</tbody>
</table>

Existing Edit 994 and Edit 996 will be triggered if a value is missing or not valid
150% Limitation – Responses

150% limitation: SULA usage will be communicated in two ways:

<table>
<thead>
<tr>
<th>1. Response File</th>
<th>2. System Generated Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Origination of awards</td>
<td>• Activity on another loan for a student at your school</td>
</tr>
<tr>
<td>• Maintenance on awards</td>
<td>• Changes in enrollment status</td>
</tr>
<tr>
<td></td>
<td>• Changes to Non-Credential Teacher Certification Program data</td>
</tr>
<tr>
<td></td>
<td>• Discharge of a loan</td>
</tr>
<tr>
<td></td>
<td>• Payment to Servicer</td>
</tr>
</tbody>
</table>

• New Message Class: **CRSU15OP** for person, award, or disbursement level

• Schools can not opt-out of receiving SULA related response

• Upon implementation, schools will receive a “blast” of System Generated Responses containing all borrowers’ SULA calculations
150% Limitation – *New Tags in Responses*

150% limitation: responses will also include new SULA tags.

### DL Subsidy Usage

- SubsidizedUsageLimitApplies
- SumActualSubUsagePeriods
- CalculatedPublishedPgmLengthYears
- MaxSubEligibilityPeriod
- AcademicYearLength
- LoanPeriodLength
- ActualSubUsagePeriod
- AnticipatedSubUsagePeriod
- SumAnticipatedSubUsagePeriods
- RemainingActualSubEligibilityPeriod
- RemainingAnticipatedSubEligibilityPeriod

### Teacher Certification Usage

- SumActualNonCredTeacherCertSubUsagePeriods
- ActualNonCredTeacherCertSubUsagePeriod
- AnticipatedNonCredTeacherCertSubUsagePeriod
- RemainingActualNonCredTeacherCertSubEligibilityPeriod
- RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod
- SumAnticipatedNonCredTeacherCertSubUsagePeriods
COD Release 13.0 DL Update - Reports

Phase 2 of 150% Direct Subsidized Loan time limit will include several COD reporting modifications.

- Direct Subsidized Loan Usage Limit (SUL) School Report to be discontinued
- New Direct Loan Subsidized Usage Change report
  - Display Subsidized loans when change to borrower’s SULA calculated values
  - Generated weekly and delivered on the COD Reporting website in CSV format
- New SULA fields in the Origination and Disbursement records of the Direct Loan Rebuild File
- New SULA fields in the Duplicate Student Borrower Report
  - For both the SAIG and CSV versions
Subsidized Usage Limit - Report

Direct Loan Subsidized Usage Change Report

- Implemented with COD Release 13.0 (Spring 2014)
- Replaces Direct Subsidized Loan Usage Limit (SUL) report
- Weekly
- COD Newsbox
- CSV format
- Displays Subsidized loans for a borrower when there is a change to the borrower’s Subsidized Usage Limitation calculated values
- Report is generated when, during the previous week, borrowers have changes to:
  - Maximum Subsidized Eligibility Period
  - Actual (or Anticipated) Subsidized Usage Period
  - Actual (or Anticipated) Non-Cred Teacher Cert Subsidized Usage Period
150% limitation: SULA calculations will be included in the Rebuild as well as new fields for existing COD Reports, including:

<table>
<thead>
<tr>
<th>Direct Loan Rebuild File</th>
<th>Direct Loan Rebuild File</th>
<th>Duplicate Student Borrower Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Origination Record</td>
<td>Disbursement Record</td>
<td></td>
</tr>
<tr>
<td>Published Program Length</td>
<td>Payment Period Start Date</td>
<td>Actual Subsidized Usage Period</td>
</tr>
<tr>
<td>Years</td>
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<td>Enrollment Status</td>
<td>Usage Period</td>
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<td>Weeks</td>
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<td>Special Program Indicator</td>
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<td>Program Credential Level</td>
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<td>Weeks Programs Academic</td>
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<td>Year</td>
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</table>
New Web Pages

150% Subsidized limitation: to assist schools, two new web pages will be added to COD Web.

1. **Subsidized Usage Limit Applies Request page**
   - Allow a user to request the most recent SULA information via a new system-generated acknowledgement
   - Reachable via the left navigation panel under the Batch tab
   - Search by borrower SSN and associated Entity ID

2. **Subsidized Eligibility Information page**
   - Accessible via a link on the Person Direct Loan Information page
150% limitation: Subsidized Usage Limit Applies Request Page
150% limitation: COD Web site
Subsidized Eligibility Information Page
# COD Technical Reference Updates

<table>
<thead>
<tr>
<th>Date</th>
<th>Technical Reference Updates</th>
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<tr>
<td>November 21-27 2013</td>
<td>New schema and other critical information needed by software developers</td>
</tr>
<tr>
<td>December 15-18 2013</td>
<td>Implementation Guide, extensive SULA information</td>
</tr>
<tr>
<td>February 24-28 2014</td>
<td>EDExpress sections, more SULA, Counseling, NSLDS Enrollment, Origination Fee processing</td>
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</tbody>
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**Note:** COD Technical Reference Common Record Layout was redesigned for the Fall 2013 publication
EDExpress Users

2014/2015 Award Year Releases

- Release 1.0 – January 2014
- Release 2.0 – April 2014
  - Pell grant functionality, Pell tables
  - Can create and save DL and TEACH
  - But do NOT originate or send Direct Loan or TEACH records to COD with this release
  - If necessary can originate and disburse online but don’t forget to request and import a Rebuild later to sync up EDExpress
- Release 3.0 – late June
  - SULA fields added to Direct Loan and Teach
  - Schools can begin to fully process
Schools are not required to go through COD testing unless they write their own software for financial aid processing with COD, but they are welcome to do so.

- **Phase 1:** January, 2014 – October 3, 2014
  Common Record manual verification, confirms that Common Record is well-structured and properly structured in accordance with Schema 4.0a

- **Phase 2:** April 7, 2014 – October 31, 2014
  Structured Application Testing
  Ensures that schools can send, receive and process batches of records with COD

- **Phase 3:** April 21, 2014 – December 12, 2014
  Unstructured Testing
  Verifies that schools can correctly create and submit all possible transactions needed.
150% Limitation - Resources

Reporting of Loan Periods & Academic Years
- Federal Loan School Support Team
- Dear Colleague Letter GEN-13-13 (5/10/2013)
- Webinar recording:
  http://www2.ed.gov/offices/OSFAP/training/specific.html
- E-mail: DLOps@ed.gov

150% Calculations & Processing
- IFAP information page
- Federal Registers (5/16/2013, 1/17/2014)
- Webinar recordings
- COD Technical Reference
- NSLDS Newsletters
- E-mail: 150Percent-Questions@ed.gov
Phase II of 150% Subsidized Loan Limitation

150% limit is met and further eligibility is lost when Remaining Eligibility Period is zero (or less).
Phase II of 150% Subsidized Loan Limitation

Maximum eligibility period is 150% of the published length of borrower’s current or upcoming academic program

- Varies by program
- Multiply published length of program by 1.5
- Measured in academic years or portions
- ED will calculate using school-reported information
- Two exceptions
Phase II of 150% Subsidized Loan Limitation

Bachelor’s degree-completion programs will have a Maximum Eligibility Period of 6 years

- Implemented by reporting program length as 4 years
- Definition:
  - Only admits students who have completed
    - Associate degree or
    - Two years of prior undergraduate coursework
Phase II of 150% Subsidized Loan Limitation

Special admission associate degree programs will have a Maximum Eligibility Period of 6 years

• Implemented by reporting program length as 4 years
• Definition: Only admits students who have completed
  ✓ Associate Degree
  or
  ✓ Two Years of prior undergraduate coursework
• Admits students on a competitive basis
  ✓ i.e., no open enrollment
• Prepares students for occupation requiring licensure from state
  ✓ Example: Nursing program
Phase II of 150% Subsidized Loan Limitation

150% limit is met (eligibility is lost) when remaining eligibility period is zero (or less).
Phase II of 150% Subsidized Loan Limitation

A Subsidized Usage Period is the period of time for which a borrower receives a Direct Subsidized Loan

- Calculated loan-by-loan
- Measured in academic years or portions
- Rounded up or down to the nearest tenth of a year
- Includes ONLY periods when Direct Subsidized Loan funds are received
- ED will calculate using school-reported information
- There are two exceptions...
Phase II of 150% Subsidized Loan Limitation

\[ \text{Subsidized Usage Period} = \frac{\text{Days in Loan Period}}{\text{Days in Academic Year}} \]

Loan Period: Period of enrollment for which loan is intended

Academic Year: Period used to track annual loan limits (SAY/BBAY)
Questions?

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Federal Loan School Support Team
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