To ensure quality training we ask all participants to please fill out an online session evaluation

https://s.zoomerang.com/s/KevinCampbell-TX
ED presentations will be available at www.lasfaa.org
Secretary Duncan Resigning

John King, who has been delegated the Deputy Secretary’s duties since January, and who is a former New York State Education Commissioner, will take up the duties of Secretary in December.
No Government Shutdown

For Now…
National DL/FFEL CDR

National Student Loan Default Rates


Issue Date

13.4%  14.7%  13.7%  11.8%

11.8%
Number of Schools – 82
Number of borrowers entering repayment – 58,468
Number of borrowers defaulting – 6,970
LA CDR - 11.9%
Default Prevention Resource Information

Federal Student Aid is committed to assisting schools with efforts that educate students about their loan repayment obligation, encourage successful repayment, and address delinquent repayment when it occurs. By employing evaluation, prevention, and outreach activities, schools can work in advance to reduce the risk of default by their students. Ultimately, this intervention will assist schools in managing their cohort default rates.

Through this page, Federal Student Aid consolidates delinquency and default prevention resources in one location for schools. The information is organized into key topical areas below and other useful contact, Web site, training, and guidance links to the right. Each time we update this page, a notice will appear on the IFAP Web site's "What's New" page and in the IFAP subscription e-mail.

In addition to default prevention assistance, Federal Student Aid provides cohort default rate (CDR) support for schools and default resolution support for student and parent borrowers. Our federal loan servicers also provide delinquency and default prevention support for schools and borrowers. To obtain each type of assistance, click on the applicable link under "Contact Information" in the top right corner of this page.

Default Prevention Resources - Encouraging Successful Repayment
Click on items in this box to access repayment preparation resources for borrowers. These include information about entrance and exit counseling, repayment plans, and deferment/forgiveness options.

Entrance Counseling on StudentLoans.gov
Exit Counseling on StudentLoans.gov
Default Prevention Plan Overview
Default Prevention Plan Regulations at 34 CFR 668.217

Default Prevention Resources - School Default Prevention Plan Requirement
Click on the items in this box to access an overview of default prevention plan regulations for schools with 3-Year Cohort Default Rates 30% or Greater for one or two years.

Training & Conferences
- Training Registration
- Training Announcements
- Training Information
- FSA Conferences

Other Default-Related Web Sites
- Default Management Web Site
- eCDR Appeals Web Site

Contact Information
- Default Prevention Assistance
- Operations Performance Division (for CDR assistance)
- Default Resolution Group
- Loan Servicing Centers for Schools
- Loan Servicing Centers for Students
Application Processing
Prior Prior Year for FAFSA

• 2017-2018 Processing Announcements
  – Beginning with 2017-2018, the FAFSA cycle will begin October 1 instead of January 1
    • 2017-2018 FAFSA filing will begin October 1, 2016
    • Gives more time to review, submit & update FAFSA data
  – Beginning with 2017-2018, FAFSA income information will come from the “prior, prior year”
    • 2017-2018 FAFSA will collect tax year 2015 income data
    • Reduces the use of estimated income and increases the use of the Data Retrieval Tool (DRT)

*More information coming soon. Stay tuned to IFAP!*
Entrance/Exit Counseling Reminders
<table>
<thead>
<tr>
<th>Counseling type</th>
<th>Required for:</th>
<th>When:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Entrance</strong></td>
<td>• First time subsidized or unsubsidized loan borrowers</td>
<td>Prior to receiving funds the first time a student borrows as an undergraduate or graduate/professional student</td>
</tr>
<tr>
<td></td>
<td>• First time graduate/professional student PLUS borrowers</td>
<td></td>
</tr>
<tr>
<td><strong>Financial Awareness Counseling (FAC)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Not required</td>
<td></td>
</tr>
<tr>
<td><strong>PLUS</strong></td>
<td>PLUS Borrowers (graduate/professional students and parents) who have an adverse credit history but who</td>
<td>Each year the borrower requests a PLUS loan and has an adverse credit history.</td>
</tr>
<tr>
<td></td>
<td>• Obtain an endorser</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Satisfactorily document extenuating circumstances to the Department of Education</td>
<td></td>
</tr>
<tr>
<td><strong>Exit</strong></td>
<td>Student borrowers</td>
<td>When student borrowers graduate, leave school, or drop below half-time enrollment</td>
</tr>
<tr>
<td><strong>TEACH Initial and Subsequent Counseling</strong></td>
<td>TEACH Grant recipients</td>
<td>Each year a student receives a TEACH Grant</td>
</tr>
<tr>
<td><strong>TEACH Exit Counseling</strong></td>
<td>TEACH Grant recipients</td>
<td>When TEACH Grant recipient leaves school, drops below half-time enrollment, or leaves the</td>
</tr>
</tbody>
</table>
Sequestration

(GEN-15-07)
<table>
<thead>
<tr>
<th>Loan Type</th>
<th>Impacted Loans</th>
<th>Loan Fee Percent</th>
<th>Fee Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Subsidized Loans and Direct Unsubsidized Loans</td>
<td>FY 2015 First disbursed on or after October 1, 2014 and before October 1, 2015</td>
<td>1.073</td>
<td>$59.01 on a $5,500 loan</td>
</tr>
<tr>
<td></td>
<td>FY 2016 First disbursed on or after October 1, 2015 and before October 1, 2016</td>
<td>1.068</td>
<td>$58.74 on a $5,500 loan</td>
</tr>
<tr>
<td>Direct PLUS Loans (Parent and Grad/Prof Student)</td>
<td>FY 2015 First disbursed on or after October 1, 2014 and before October 1, 2015</td>
<td>4.292</td>
<td>$429.20 on a $10,000 loan</td>
</tr>
<tr>
<td></td>
<td>FY 2016 First disbursed on or after October 1, 2015 and before October 1, 2016</td>
<td>4.272</td>
<td>$427.20 on a $10,000 loan</td>
</tr>
<tr>
<td>Award Year</td>
<td>Impacted Awards</td>
<td>Statutory Award Amount</td>
<td>Reduction from Statutory Award Amount</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>-----------------------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td>2014-2015</td>
<td>First disbursed prior to October 1, 2014 (FY 2014 Sequester)</td>
<td>$5,730</td>
<td>7.20%</td>
</tr>
<tr>
<td>2014-2015</td>
<td>First disbursed on or after October 1, 2014 and before October 1, 2015 (FY 2015 Sequester)</td>
<td>$5,730</td>
<td>7.30%</td>
</tr>
<tr>
<td>2015-2016</td>
<td>First disbursed on or after October 1, 2014 and before October 1, 2015 (FY 2015 Sequester)</td>
<td>$5,775</td>
<td>7.30%</td>
</tr>
<tr>
<td>2015-2016</td>
<td>First disbursed on or after October 1, 2015 and before October 1, 2016 (FY 2016 Sequester)</td>
<td>$5,775</td>
<td>6.80%</td>
</tr>
<tr>
<td>Award Year</td>
<td>Impacted Awards</td>
<td>Statutory Maximum Scheduled Award Amount</td>
<td>Percentage Reduction from Statutory Award Amount</td>
</tr>
<tr>
<td>------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>------------------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>2014-2015</td>
<td>First disbursed prior to October 1, 2014 (FY 2014 Sequester)</td>
<td>$4,000</td>
<td>0.89%</td>
</tr>
<tr>
<td></td>
<td>First disbursed on or after October 1, 2014 and before October 1, 2015 (FY 2015 Sequester)</td>
<td>$4,000</td>
<td>7.30%</td>
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<td>6.80%</td>
</tr>
</tbody>
</table>
INTEREST RATES:
Bipartisan Student Loan Certainty Act of 2013

(EA – May 15, 2015)
Interest Rates

• New rate structure applies to all loans first disbursed after June 30, 2013
• Annual fixed rates based on 10 Year T-Bill plus add-on
• Applies to loans first disbursed between July 1 and June 30
• Rate applies for the life of the loan
Interest Rates 2015-2016

Effective for loans first disbursed on or after July 1, 2015:

Undergraduate Students - Sub and Unsub

- **4.29%** (last year’s Sub and Unsub was 4.66%)
- Add-on of 2.05% with cap of 8.25%

Graduate students – Unsubsidized Loans only

- **5.84%** (last year’s Grad Unsub – 6.21%)
- Add-on of 3.60% with cap of 9.5%

PLUS Loans (parent and grad/professional)

- **6.84%** (last year’s – 7.21%)
- Add-on of 4.60% with cap of 10.5%
CORRECTION
2013 Fall LASFAA Conference

• Presentation about modules and Return of Title IV
• Newly obtained guidance changes three of the six examples that were discussed
• The example was a semester containing three modules
• When a student withdraws from a module and wants to come for a later module, school must obtain written confirmation from student that she will return for the future module.
• But if a student completes Module 1 and does not have classes in Module 2, but does have classes in Module 3, no written confirmation is necessary.
• 2013 presentation had three scenarios, #4, #5 & #6, that indicated that written confirmation was necessary.
• Recent guidance indicates that this scenario is not a withdrawal since the student completed Module 1 and was not expected to attend Module 2, UNLESS the student does not return for Module 3.
Verification
2016-17 Verification – Overview

• Same data elements as for 2015-2016 award year
• Some modifications and clarifications to acceptable documentation
• In limited circumstances, an applicant’s Verification Tracking Group could change
• Resources
  – GEN-15-11
  – Suggested Text – Coming soon!
2016-17 Verification

Verification Tracking Group changes:

• Verification Tracking Group V3 (Child Support Paid) has been removed

• Applicants placed in V1, V4, V5, and V6 must still verify child support paid if reported on ISIR
2016-17 Verification

Verification Tracking Group changes:

- Applicants may be moved from previously assigned Groups V1, V4, and V6 to Verification Tracking Group V5
  - Applicant is only required to verify the additional items in V5 that were not previously verified
  - If the applicant is moved to Verification Tracking Group V5, no additional disbursements of any Title IV aid may be made until verification is satisfactorily completed
Verification Tracking Group changes:

• Applicants moved to Verification Tracking Group V5
  – If Title IV aid had been disbursed prior to receiving an ISIR with the new V5, and the applicant does not complete verification, the applicant is liable for the full amount of TIV aid disbursed for 2016-2017
  – The institution is not liable
Verification Policy Updates

• Copy of the *tax return was not retained by tax filer and cannot be located by the IRS*, student must submit:
  • Copy of all relevant W-2s
  • Signed statement that individual did not retain a copy of his or her tax account information, and
  • Documentation from the IRS that indicates that the individual’s tax account information cannot be located

• *Child support paid*
  • Removed a separation agreement or divorce decree from acceptable documentation
Verification Policy Updates

High School Completion Status

- For V4 and V5, if institution successfully verified and documented applicant’s high school completion status for a prior award year, verification of high school completion status is not required for subsequent years.
- An institution may not accept as alternative documentation an applicant’s self-certification, nor a DD Form 214 Certificate.

Identity/Statement of Educational Purpose

- The valid government-issued photo identification used to verify an applicant’s identity must not have expired.
Verification Policy Updates

Victims of IRS tax-related identity theft must submit:

• Statement signed and dated by tax filer indicating they were victims of IRS tax-related identity theft and the IRS has been made aware of the tax-related identity theft; and

• A Tax Return Database View (TRDBV) transcript obtained from the IRS
  – Tax filers who cannot obtain a TRDBV transcript may instead submit another official IRS transcript or equivalent document provided by the IRS if it includes all of the income and tax information required to be verified

Guidance applies to 15/16 and subsequent years
• Posted in 6/26/15 Federal Register Notice
Verification Policy Updates

*Individuals who filed an amended tax return must submit the following documents to the institution:*

- an IRS Tax Return Transcript, or any other IRS tax transcript(s) that include all of the income and tax information required to be verified; and
- a signed copy of the IRS Form 1040X that was filed with the IRS

Guidance effective 8/13/15 for 15/16 and subsequent years
  - Posted on Program Integrity Q & A website
For remainder of the 15-16 award year verification process, a signed paper copy of a 2014 IRS tax return may be provided by the tax filer as "acceptable documentation" for income and other tax related verification information if the tax filer had recently requested a transcript from the IRS but was unsuccessful in obtaining the transcript.
Update for 15-16 Verification

- A signed copy of the relevant (i.e., applicant, spouse, or parent) 2014 IRS tax return that was filed with the IRS.
- A statement from the tax filer, on or attached to the tax return, which certifies that the tax return submitted to the institution includes the same information that was submitted to the IRS.
- Documentation from the IRS that the transcript request was unsuccessful.
- A completed and signed IRS Form 4506T-EZ or Form 4506-T that includes on line 5 the name, address, and telephone number of the institution as the third party to whom the IRS is to mail the 2014 IRS transcript. The institution should proceed with verification and simply retain the IRS Form 4506T-EZ or Form 4506-T and not submit it to the IRS.
- Please see Oct 2 EA for much more info.
Update for 15-16 Verification

• The unavailability of the "Get Transcript Online" tool is not a sufficient reason for an institution to accept the alternative documentation.

• However, tax filers are able to request a transcript online at www.irs.gov using the Get Transcript by Mail service, over the phone at 1-800-908-9946, or by using paper Form 4506T-EZ or Form 4506-T.

• The IRS has assured ED that successfully authenticated transcript requests submitted by any of those methods will result in a transcript being mailed to the tax filer, generally within 5 to 10 business days of receipt of the request.
Career Pathway Programs & Title IV Eligibility

GEN-15-09
Changes in the Law

• Consolidated and Further Continuing Appropriations Act of 2015 (Pub. L. 113-235) enacted 12/16/14
  • Changed section 484(d) HEA to allow a student who does not have a high school diploma (or recognized equivalent), or who was not properly homeschooled, to be eligible for Title IV aid through ability to benefit (ATB) alternatives, but **ONLY if the student is enrolled in an "eligible career pathway program"**
    • Any type of institution may offer eligible career pathway programs
    • **No requirement to offer eligible career pathway programs**

Guidance - GEN-15-09
The Consolidated Appropriations Act of 2012 amended section 484(d) of the HEA to allow a student without a high school diploma (or recognized equivalent), and who attended an eligible program at a Title IV institution prior to July 1, 2012, to be eligible for Title IV aid under the previous ATB alternatives (GEN-12-09).

Eligible students were referred to as having been “grandfathered”

The new ATB provision in Pub. L. 113-235 (career pathway programs) does NOT affect the eligibility of students grandfathered under the 2012 provision.
Eligible Students

- Students enrolled in an eligible career pathway program, on or after July 1, 2014, (who are not HS graduates, properly homeschooled, or do not meet HS equivalent conditions) may be eligible to receive Title IV aid if meet one of the following ATB alternatives (484(d)(1)):
  - Passes an independently administered Department of Education approved ATB test
  - Completes at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by the postsecondary institution
  - Completes a State process approved by the Secretary
    - No State process has ever been sent for ED approval
Approved ATB Tests

Electronic Announcement – June 24, 2015

• Newly approved ATB tests – effective July 1, 2015
  – Wonderlic Basic Skills Test Verbal Forms VS-1/VS-2, Quantitative Forms QS-1/QS-2 – both paper and online
  – Spanish Wonderlic Basic Skills Test Verbal Forms VS-1/VS-2, Quantitative Forms QS-1/QS-2 – both paper and online

• Effective November 1, 2015, only these two Spanish ATB tests are permitted for ATB purposes for Spanish speaking students
Approved ATB Tests

Electronic Announcement – June 24, 2015

• Continuing ATB tests
  – CELSA Forms 1 and 2 & ACCUPLACER
  – ASSET, COMPASS AND COMPASS ESL
    • eligible through 10/31/15

Please see the 6/24/15 EA for ATB passing scores, publisher contact information and a list of ATB tests no longer approved.
Eligible Career Pathway Program

- An eligible career pathway program (484 (d)(2)) must:
  - Concurrently enroll students in connected adult education and eligible postsecondary programs;
  - Provide students with counseling and supportive services to identify and attain academic and career goals;
  - Provide structured course sequences that—
    - Are articulated and contextualized; and
    - Allow students to advance to higher levels of education and employment;
  - Provide opportunities for acceleration for students to attain recognized postsecondary credentials, including degrees, industry relevant certifications, and certificates of completion of apprenticeship programs;
Eligible Career Pathway Program

- An eligible career pathway program (484 (d)(2)) must:
  - Be organized to meet the needs of adults;
  - Be aligned with the education and skill needs of the regional economy; and
  - Have been developed and implemented in collaboration with partners in business, workforce development, and economic development.
Eligible Career Pathway Program

- Eligible career pathway programs contain 2 components:
  - an adult education component, and
  - a Title IV eligible postsecondary program component
Eligible Career Pathway Program

- An eligible career pathway program, as defined in section 484(d)(2) of the HEA, is not itself a TIV eligible program under 34 CFR 668.8 because it contains an adult education component that includes, by definition, coursework that is below the postsecondary level.

- An eligible career pathway program will never be submitted to ED for approval
  - Will never appear on your ECAR
- The school must determine if a career pathway program meets the criteria as outlined in the law and GEN-15-09
  - If necessary, must provide documentation to auditors and reviewers
Eligible Career Pathway Program

Restrictions

• May not include cost of the adult education component of an eligible career pathway program in student’s Cost of Attendance (COA)
• May not pay for the cost of the adult education component using Title IV aid
  • only costs that can be included in COA are those associated with the Title IV eligible postsecondary program component
Eligible Career Pathway Program

Restrictions

• Credit or clock hours associated with adult education coursework cannot be incorporated into a student’s Title IV enrollment status, regardless of whether the institution considers the adult education coursework to be remedial

• Remedial coursework associated with the Title IV eligible postsecondary program component and not considered part of the adult education coursework is eligible for TIV aid within normal remedial limits
  – 30 semester hours; 45 quarter hours; 900 clock hours
Eligible Career Pathway Program

• Career Pathway Program Definitions:
  • The definition of an eligible career pathway program under section 484(d)(2) of the HEA may differ from definitions under the Workforce Innovation and Opportunity Act, and in other laws, including State and local laws
  • A program that qualifies for funding under the Workforce Innovation and Opportunity Act or another law may not meet the definition of an eligible career pathway program in section 484(d)(2) of the HEA
  • To provide Title IV aid to students under the ATB alternatives under the new law, an institution must ensure that its eligible career pathway program(s) meets the requirements under section 484(d)(2) of the HEA as described in GEN-15-09
Limited Pell Grants

• Any student whose first enrollment in ANY Title IV eligible postsecondary program was on or after July 1, 2015, and is eligible under one of the ATB alternatives for enrollment in an eligible career pathway program, will ONLY be eligible for a Limited Pell Grant award

• Maximum limited Pell Grant amount for 15/16 is $4,860
  • Maximum regular Pell Grant amount for 15/16 is $5,775 (non-ATB)
Limited Pell Grants

• **IMPORTANT:** Schools are responsible for determining student eligibility and the correct award amount for students who receive a Federal Pell Grant award under the Career Pathway Alternative Pell Grant Disbursement Schedules

• At this time, COD does not contain these schedules and there are no system edits on the Pell Grant award amount related to these schedules
<table>
<thead>
<tr>
<th>Type of Program in Which Student is Currently Enrolled</th>
<th>Prior to July 1, 2012 (Grandfathered Students)</th>
<th>On or after July 1, 2012, but prior to July 1, 2015</th>
<th>On or after July 1, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title IV eligible postsecondary program that is part of an eligible career pathway program</td>
<td>Eligible for Title IV aid, including a Regular Pell Grant award* for all award years, including 2014-2015 and thereafter</td>
<td>Eligible for Title IV aid, including a Regular Pell Grant award* for only 2014-2015 and thereafter</td>
<td>Eligible for Title IV aid, including a Limited Pell Grant award** for only 2015-2016 and thereafter</td>
</tr>
<tr>
<td>Title IV eligible postsecondary program that is NOT part of an eligible career pathway program</td>
<td>Eligible for Title IV aid, including a Regular Pell Grant award* for all award years, including 2014-2015 and thereafter</td>
<td>Not eligible for Title IV aid</td>
<td>Not eligible for Title IV aid</td>
</tr>
</tbody>
</table>
Additional Programs

• If a student completes a career pathway program and then enrolls in a regular TIV eligible academic program, the student will not be eligible for additional TIV funds UNLESS they now have a high school diploma or equivalent.
Gainful Employment
Gainful Employment - Regulations

• Notice of Proposed Rulemaking (NPRM)
  • Federal Register - March 25, 2014
  • OPE Website with discussions and materials associated with GE negotiated rulemaking:

• Final Federal Register - October 31, 2014
  • Effective date - July 1, 2015
The HEA provides that to be Title IV eligible an educational program must be offered by:

A public or non-profit postsecondary educational institution and leads to a degree; or

Any institution and “to prepare students for \textit{gainful employment} in a recognized occupation”

- Generally, all non-degree programs must lead to \textit{gainful employment}
- Generally, all programs at for-profit institutions must lead to \textit{gainful employment}
GE Programs

- At public institutions and not-for-profit institutions, all NONDEGREE programs are GE Programs except for:
  - Programs of at least two years in length designed to be fully transferable to a bachelor’s degree program where the institution does not confer a credential upon completion of the coursework
  - Approved Comprehensive Transition and Postsecondary Programs for students with intellectual disabilities
  - Preparatory coursework necessary for enrollment in an eligible program; and
  - Teacher certification programs where the institution does not award a credential
GE Programs

• A school INCORRECTLY thought that certificate programs that transferred all credits to an Associate Degree program were not GE programs.

• THIS IS INCORRECT!

• The phrase “leads to” is used by ED to describe a program that terminates in a degree

• This school used “leads to” to be synonymous with “transfers”
Gainful Employment Measure

- Debt-to-earnings (D/E) rates
  - Annual Earnings D/E rate
  - Discretionary Income D/E rate
- Passing: Annual D/E $\leq 8\%$ or Discretionary D/E $\leq 20\%$
- Failing: Annual D/E $> 12\%$ or Discretionary $> 30\%$
- Zone: Annual D/E $> 8\%$ and $\leq 12\%$ or Discretionary D/E $> 20\%$ and $\leq 30\%$
Gainful Employment Results

• Program’s loses Title IV eligibility if:
  • D/E measures – Fails in two out of three years
  OR
  • D/E measures - Fails or in the zone for four consecutive years
GE Reporting

- Reported all Title IV students by July 31, 2015
  - Report 2008-09 through 2013-14 award years
  - Programs with Medical and Dental Residencies report 2007-08 through 2013-14 award years

- Report future award years by October after end of the award year
  - Reported 2014 – 2015 Award Year by October 1, 2015
GE Program Tracking

- Gainful Employment Program Tracking Web page (NSLDS)
  - Listed under the ORG Tab
  - Provides a listing of the GE programs ED records show the institution offers
  - Shows whether the institution has reported to NSLDS the GE information for any required programs

- Resources
  - NSLDS Gainful Employment User Guide, Chapter 4
  - “GE Program Detail Response Status Report” - provides GE data institution has reported to NSLDS

See Oct 8 EA # 61
GE Program Tracking List

- Displays a unique list of GE programs, from the various sources, for an institution
- Institutions can update
- Available in August 2015
GE Program Tracking - Corrections

• GE EA #60 – September 4, 2015
  • GE programs listed were based in part on COD origination information for 14-15 which indicated a program was GE
  • Many errors are program credential level code errors
    • Errors must be corrected in NSLDS and COD accordingly
  • If Program Credential Level code in GE Program Tracking List is not correct due to inaccurate COD reporting, select ‘I2’ (Program Was Not Title IV Eligible) for a status code
  • Program Credential Level Code errors in COD can be corrected by sending maintenance record that contains updated values or by making appropriate updates to Program Credential Level codes online using COD Web site
Certifications

GE electronic announcement #54 – June 11, 2015

- New PPAs executed on or after July 1, 2015 will have the new certifications incorporated into the PPA language
- TIV schools that won’t execute a PPA between July 1, 2015 and December 31, 2015 must provide a Transitional Certification signed by CEO/President to GECertification@ed.gov
  - Certifying each GE program meets all TIV eligibility criteria
Certifications

GE electronic announcement #54 – June 11, 2015

- After transitional certification provided, adding/revising GE program data on E-App that does not result in a new PPA, will need to provide a new certification each time E-App is updated

- Certification processing instructions and sample certification language are attached to the GE EA #54

- Questions/concerns, please email - GECertification@ed.gov
Disclosures Under New Final Rules

• Through December 31, 2016, current disclosure requirements remain in effect
  • Occupations; Normal time to complete program; On-time graduation rate for completers; Tuition & fees, books & supplies, room & board; Placement rate for completers (as determined by State or Accreditor methodology); and Median loan debt

• Institutions must comply with new disclosure requirements (October 31, 2014 Final Rules) beginning January 1, 2017
  • ED to conduct consumer testing and hold focus groups to determine new disclosure requirements and prepare new disclosure template
GE Disclosure Resources

• GE Disclosure Template
  – Requirement
  – Template application
  – Quick start guides
  – Bulk data file upload tool
  – Help desk: (855) 359-3697, gedt@inovas.net
Important Dates

**Reporting**
- **July 31, 2015** (for 2008/2009 to 2013/2014 data)
- **Oct 1, 2015** (for 2014/2015 data)

**Program Certifications**
- **Dec 31, 2015**

**Draft Debt-to-Earnings Rates**
- **Summer 2016**

**Disclosures**
- **Jan 31, 2015** (per Current Regulations)
- **Jan 1, 2017** (per New Regulations)
GE Resources

• GE Information Page on IFAP
  – Federal Register Notices; DCLs; Electronic Announcements; FAQs; Webinars; Presentations; Resources

• NSLDS Gainful Employment User Guide
  (new version published Oct 15)

• Gainful Employment Operations Manual

• GEN-15-12 – GE regulatory overview

• ANN-15-01 - Recorded Webinar – GE Reporting

send questions to GE-Questions@ed.gov
Federal Perkins Loan Program is Ending

– Federal Perkins Program

• The statutory authority to make Perkins loans to new borrowers ended on September 30, 2015
  – If prior to October 1, 2015, school makes the first disbursement of a Federal Perkins Loan to a student for the 2015-2016 award year, school may make any remaining disbursements of that 2015-2016 loan after September 30, 2015

See the Perkins wind-down Q & As available under the “Hot Topics” area of IFAP.ed.gov (upper right-hand corner)
Regulatory Activity
Program Integrity “Proposed” Rules

• Notice of Proposed Rule-Making (NPRM) published on May 18, 2015

• Comments must have been received by July 2, 2015

• Main Topics:
  – Cash Management
  – Repeat Coursework
  – Clock-to-Credit Conversion (“clock hour program definition”)
Additional DCLs & Announcements
Dear Colleague Letters

• GEN-15-20 – DL/FFEL Reaffirmation Agreement
  • Borrower who inadvertently exceeds an annual or aggregate loan limit can regain Title IV eligibility by reaffirming the excess Direct Loan or FFEL program loan amount
  • Contains the basic steps required to reaffirm a debt
  • Resolution is reached as of the date the servicer receives the student’s signed reaffirmation agreement
  • Attached to the DCL is the new reaffirmation agreement with a June 30, 2018 expiration date that must be used no later than March 16, 2016
Dear Colleague Letters

• **GEN-15-19 – Perkins Excess Liquid Capital**
  
  • Reminds institutions that participate in Perkins they must return to the Department (ED) the *Federal portion* of any Excess Liquid Capital in their Perkins Loan Revolving Fund
  
  • Includes interactive worksheets to determine Excess Liquid Capital (ELC) that must be returned
    
    • ELC is the amount of the Fund’s “Cash On Hand” that is in excess of the institution’s estimated immediate needs
  
  • ED allows the institution to calculate the *Federal share* to be returned to ED and the *institutional share* that must be removed from the Fund and returned to the institution
  
  • The Federal share of the institution’s ELC must be returned to ED via G5 no later than December 31, 2015
Dear Colleague Letters

• GEN-15-16 – Unaccompanied Homeless Youth Decisions
  • Reviews basic definitions, the application process, FAA protocols and possible documentation
  • *Remind institutions that they should limit any inquiry to whether the applicant has been determined to be an unaccompanied youth who is homeless, or at risk of being homeless, rather than the reasons for the applicant’s homelessness (why)*
  • If student unable to answer “yes” to the homeless youth dependency questions, is determined to be an unaccompanied youth who is homeless or at risk of being homeless by the FAA, then the FAA must submit a FAFSA “correction” using the “Homeless Youth Determination” flag
Dear Colleague Letters

• GEN-15-15 – Annual Security Report Changes
  – Provides summary of significant changes including:
  • Maintain statistics about the number of incidents of dating violence, domestic violence, sexual assault, and stalking
  • “Clery geography” includes areas within the patrol jurisdiction of the campus police or the campus security department
  • Definitions of dating violence, domestic violence, sexual assault and stalking
  • Updated crime definitions under the FBI’s Uniform Crime Reporting program
  • And others…
Dear Colleague Letters

- **GEN-15-10 – State Authorization**
- Final regulations were effective July 1, 2011
  - ED provided for delays of implementation date (34 CFR 600.9(a) and (b)) so long as the State was establishing an acceptable authorization process effective by July 1, 2015
    - The stay of these regulations ended June 30, 2015
  - These regulations do not apply to distance programs, only to physical locations of an institution of higher education
    - If state officials have concerns - contact Sophia McArdle - (202) 219-7078; stateauthorization@ed.gov
    - If school officials have concerns - contact the Dallas School Participation Division at 214.661.9490
Dear Colleague Letters

GEN-15-08 – Citizenship and Immigration Documentation

• Process through which a school and student can confirm student’s citizenship or immigration status when student is unable to appear in person at school

– Confirmation of Eligible Noncitizen Status

• If unable to provide original documentation (e.g. distance education), school policy may permit students to photocopy, scan, or image immigration documents, and submit electronic images or paper copies to school

• Subsequently, the school must initiate paper-based secondary confirmation process using the G-845 form once documents received from noncitizen student
GEN-15-08 – Citizenship and Immigration Documentation

• Photocopying or Imaging
  • Reproduction of these documents is lawful for limited purpose of applying for Title IV aid
  • A school may provide additional guidance on how (e.g. time, place, and media) student should submit photocopies or other images of his or her documentation
  • If the school chooses to allow a student to submit a hard copy or electronic image of an original document, school should have a process in place to ensure that a student is submitting an exact copy, such as an affidavit
    – a sample copy of an affidavit is attached to the DCL
Dear Colleague Letters

GEN-15-06 – Loan Counseling Requirements/Flexibilities

• Series of Q & As designed to discuss the statutory and regulatory requirements for entrance counseling as well as institutions’ flexibility to augment that counseling

• Two main regulatory premises:
  – Once borrower has completed required entrance counseling, either at current institution or at previous institution, borrower cannot be required to participate in any subsequent counseling as a condition of receiving Direct Loans
  – Borrower makes the decision of whether to borrow and how much to borrow (up to annual and aggregate limits), not the institution - except an institution may, on a case-by-case basis, deny or reduce a Direct Loan (34 CFR 685.301(a)(8))
Dear Colleague Letters

GEN-15-03 – Federal Perkins Program

• The statutory authority to make Perkins loans to new borrowers ended on September 30, 2015
  – If prior to October 1, 2015, school makes the first disbursement of a Federal Perkins Loan to a student for the 2015-2016 award year, school may make any remaining disbursements of that 2015-2016 loan after September 30, 2015

Series of Perkins wind-down Q & As available under the “Hot Topics” area of IFAP.ed.gov (upper right-hand corner)
10/19/15 – DL Sub Limits - Remaining Period less than One Year

- If the student's Remaining Eligibility Period is greater than 0 years, but less than 1 year students can receive a Direct Subsidized Loan if:
  - applicable minimum loan period rules apply, and
  - loan period, academic year, enrollment status, and loan amount results in a Subsidized Usage Period that is equal to or less than the student's Remaining Eligibility Period

- Provides examples of minimum loan period requirements for different academic calendars, enrollment status adjustments and loan amount considerations
Electronic Announcements

9/25/15 – 150% Direct Subsidized Loan Limit: Electronic Announcement #19 - Importance of Accurate Direct Loan and Enrollment Reporting to Prevent Loss of Subsidy

Excellent list or resources at end of EA regarding correct reporting

New Enrollment Reporting Guide published on IFAP on Oct 20
9/21/15 – New Perkins Loan Assignment System (PLAS)

- PLAS is now available at https://efpls.com

• Perkins electronic processing:
  - Submit multiple loans as a “batch file” or submit individual loans
  - Securely upload supporting documentation (prom notes, etc.)
  - Search, view, and edit submitted loan assignment information
  - View Perkins reports of accepted/rejected loans for assignment

• PLAS User Access Form and instructions, along with a PLAS User Guide is available at https://efpls.com

• An overview of the PLAS user access process is attached to the 9/21/15 EA
9/8/15 – Clery Act 3rd Party Certifications

• An institution is not required or expected to have any kind of Clery Act certification to comply with the Clery Act or the Department’s implementing regulations

• Moreover, we do not give any weight to any such certification if we review an institution’s compliance with the Clery Act
Electronic Announcements

7/9/15 – Student Eligibility Codes in COD

• Provided a chart that outlined which eligibility codes to use in COD for students with high school diplomas or equivalents and which codes to use for students qualifying for Title IV aid under ability-to-benefit (ATB)

• **IMPORTANT:** Schools are responsible for determining student eligibility and the correct award amount for students who receive a Federal Pell Grant award under the Career Pathway Alternative Pell Grant Disbursement Schedules
  – COD does not contain these schedules and there are no system edits on the Pell Grant award amount related to these schedules
Electronic Announcements

7/1/15 – Blue Book

- ED no longer publishing The Blue Book (manual of Title IV administrative guidance for fiscal officers)
- All essential guidance from The Blue Book will be placed in the FSA Handbook
6/29/15 – G-845 Form

- A new G-845 Form with an expiration date of 5/31/18 must now be used to request verification from DHS-USCIS of an applicant's eligible non-citizenship status
- The new G-845 Form and application instructions have been updated in the 15/16 FSA HDBK Vol. 1, Chapter 2
Institutional Eligibility

What are eligible institutions and why is this important to you? What should you know about accreditation, state authorization and the E-App?

Learn More
Protecting Student Information: IT Security Best Business Practices

• This webinar training is designed for IT individuals who develop and maintain security requirements for an institution, but will also be of interest to anyone in the financial aid community who wants to better understand how to reduce risks to confidential student information.

• ED will present this information in one 60-minute session, offered on four separate occasions:
  • Tuesday, October 27, 2015, at 1:00 P.M. (CT)
  • Thursday, October 29, 2015, at 10:30 A.M. (CT)
  • Tuesday, November 10, 2015, at 10:30 A.M. (CT)
  • Thursday, November 12, 2015, at 1:00 P.M. (CT)
Training

• 2015 FSA Training Conference
  • Tuesday, December 1 – Friday, December 4, 2015
  • Mandalay Bay, Las Vegas, Nevada
  • Conference and lodging registration is open!
    • fsaconferences.ed.gov (right-hand side of IFAP website)
Training

• FSA E-Training Website - fsatraining.info
  – Online training modules (e.g., Institutional Eligibility; Completing FISAP; Consumer Information, R2T4)

• 2014 FSA Training and 2015 ED NASFAA Conference presentations
  • fsaconferences.ed.gov

• Past FSA presentations in audio and video format
  • http://ifap.ed.gov/ifap/ifapMedia.jsp
  • Topics include – GE, NSLDS Enrollment Reporting and PLUS Loan Adverse Credit History changes
Training Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation

https://s.zoomerang.com/s/KevinCampbell-TX

Survey feedback is a tool to help us improve our training, justify training/travel expenditures and to listen to our customers

Please provide any comments regarding this training or the trainer to:

Jo Ann Borel, Title IV Training Supervisor    joann.borel@ed.gov
Need Help?

Research and Customer Care Center
800.433.7327
fsa.customer.support@ed.gov

Reach FSA
855.FSA.4FAA  --  1 number to reach 10 contact centers!

Campus Based Call Center  eZ-Audit
COD  School Eligibility Service Group
CPS/SAIG  Foreign Schools Participation Division
NSLDS  Research and Customer Care Center
G5  Nelnet Total & Permanent Disability Team
Contact Information

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Thank You, LASFAA!
Questions about this Session?

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