

# Volume 2 Implementation Guide

COMMON ORIGIN AND DISBURSEMENT

2025 – 2026 technical reference

**Federal Student Aid**  
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

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# Section 1:

## Implementation Guide for 2025–2026

This chapter assists Schools, EDEXpress Users, Third-Party Servicers, and Software Providers with implementing the COD System for the 2025- 26 Pell Grant, TEACH Grant, and Direct Loan Programs. It serves as a companion to the 2025-26 Overview of Changes, Common Record Layout and Edit Codes contained in this Technical Reference. This document and the XML Common Record Schema v5.0c are available at Knowledge Center Home.

For the Iraq and Afghanistan Service Grant (IASG) stand-alone program information, reference the 2023-24 COD Technical Reference.

For Academic Competitiveness Grant and National SMART information, reference the Technical Reference from Award Years 2006-07 through 2011-12.

## Common Record Valid Format Rules

### COMMON RECORD XML SCHEMA GUIDELINES

The Common Record XML Schema guidelines reflect accepted industry practices.

#### BUSINESS RULES

1. The Common Record XML Schema contains the validation rules for the Common Record document that is transmitted to COD.
2. XML Schema version information is reflected in the Namespace attribute `xmlns` and its value in the root element of the Common Record document. (e.g. `<xsd:schema targetNamespace="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c" elementFormDefault="qualified"> <xsd:element name="CommonRecord" type="cod:CommonRecordType"> .`
3. The Namespace attribute and its value are required on all 2003-04 and forward submissions and are echoed back in the response file.
4. The XML Schema and the namespace attribute can be used throughout the development and testing of a system to validate the system's XML document output. For example, if a 4.0a Namespace is submitted containing 4.0b elements, it is likely that there is a software configuration problem.
5. XML Schema validation is performed prior to business rule processing. If the incoming batch fails XML validation, the student and award information contained within the batch will not be processed by COD.
6. In 2014, the COD System began returning an error response file containing edit 210 on the `<DocumentID>` tag, indicating that the record failed schema validation, if the incoming common record fails schema validation. In the past, files that failed to process did not receive a response file. These files will contain the same structure as a batch level reject response file and will contain the edit 210.
7. In March 2017, the COD System retired warning edit 211 for records submitted in the 4.0c schema. All records submitted in the 4.0c schema must pass full schema validation.

## EDExpress for Windows 2025-26

EDExpress for Windows 2025-25, (available Spring 2025) communicates to COD using the Common Record in XML for Pell Grant, TEACH Grant, and Direct Loan awards. The External Import Add and Change files and External Export files for EDExpress Combination System users continue to be offered in fixed-length format and not XML.

### **BUSINESS RULES**

1. EDExpress for Windows 2025-26, Release 2.0 exports and imports the XML Common Record to and from COD.
2. EDExpress Users should refer to the sections within Volume 3 – Common System Technical Reference of this technical reference as their reference tool.
3. The External Import Add and Change files and External Export files used by EDExpress 2025-26, Release 2.0 to interface with Combination and Mainframe Systems are offered in fixed-length format and not XML for 2025-26. Users with Pell, TEACH Grant and/or Direct Loan systems used in combination with EDExpress should refer to Volume 3 – Combination System Technical Reference of this technical reference.
4. All reports continue to be produced and imported into EDExpress in current formats and not XML.

## 2025-26 Common Record XML Schema

All tag names in the 2025-26 Common Record XML schema v5.0c reflect standards and recommendations from the Post-Secondary Electronic Standards Council. The Common Record XML schema 5.0c latest release is available at [Knowledge Center Home | Home](#).

### **BUSINESS RULES**

Please see the Common Record Schema Guidelines topic for more information about editing against the Namespace attribute.

1. All Common Record document submissions for the 2025-26 Award Year and forward must conform to Common Record XML schema version 5.0c.
2. All Common Record document submissions for previous award years must conform to the Common Record XML schema version 5.0c, or previous schema versions 5.0b, 5.0a, 4.0e, 4.0d, 4.0c, 4.0b, 4.0a.

3. System-generated documents for all award years are sent in the highest XML schema version, 5.0c. Web responses are also sent out in this schema version.
4. All Responses are returned in the same Common Record XML schema version as the submitted Common Record document.
5. The COD System uses the Document Information Block Common Record root element `<CommonRecordxmlns="http://www.ed.gov/FSA/COD/2024/v5.0c">` as an indicator of the XML schema version to which the Common Record document conforms. The COD System processes the Common Record Document using the XML schema version indicated by this tag.

## MAXIMUM LENGTH VALUES AND LEADING ZEROES

XML does not require that the data for a specific tag occupy the maximum length. However, the data cannot exceed the maximum length specified for a tag or the batch cannot be processed. Refer to the Common Record Layout topic in Volume 2, Section 3 – Common Record Layout for “max length” valid field lengths.

The following tags will have the leading zeroes removed from the System Generated Response files with the 3.0e schema version going forward:

- Financial Award Number
- Total Eligibility Used (TEU)
- Lifetime Eligibility Used (LEU)
- Disbursement Number
- Disbursement Sequence Number
- Previous Sequence Number
- DL Loan Information Award Key
- Award Key
- Counseling Sequence Number
- Application ID
- Previous Application ID

## BUSINESS RULES

1. Do not include leading zeroes and spaces to satisfy the maximum length for a given tag.

### Example 1

In the example below, the student's first name, John, is four characters long. Although the first name tag has a maximum length of 35 characters, leading zeroes or spaces are not necessary to occupy the maximum length of the tag.

```
<FirstName>JOHN</FirstName>
```

### Example 2

In the example below, the Disbursement Amount is 400.00. Although the disbursement amount tag has a valid value up to 99999999.99, leading zeroes or spaces are not necessary to occupy the length of the tag. `<DisbursementAmount>400.00</DisbursementAmount>`

## EMPTY (BLANK) AND NULL TAGS

The COD System differentiates between a tag being empty (blank) and a tag being null in the database.

## BUSINESS RULES

1. An empty tag is one in which content of the tag equals blank or spaces.
2. An empty tag is reported as:

```
<PhoneNumber></PhoneNumber> or
```

```
<PhoneNumber/>
```

3. Tags not necessary or not applicable for the document submission should be omitted, rather than reported as empty. Please see examples 1, 2.
4. A blank tag is reported as:

```
<PhoneNumber></PhoneNumber>
```

5. Tags that are defined as enumerated lists and can contain blank as a valid value have `<xsd: enumeration value= " " />` defined for them in the XML Common Record Schema.



6. If a school reports blank for a tag defined as an enumerated list that does NOT have blank as a valid value defined in the XML Common Record Schema, the file will fail XML validation and will not be processed by the COD System.
7. If a school reports a blank value for a tag that does have blank as a valid value defined in the XML Common Record Schema, blank will override the data in the COD database.
8. A null tag is used to remove or delete content currently on the COD database.
9. A null tag (nil="true") is reported as:  
  
`<PhoneNumber xsi:nil="true"/>`
10. Tags that can contain null values have a nil="true" attribute set for them in the XML Common Record Schema.
11. If a tag has a "min occurs" value greater than zero and the school has no content to report in that tag, the school must report a null tag.

#### Example 1

If a student does not have a Middle Name, the Middle Name tag should be omitted from the Common Record, rather than reported as empty or blank.

`<Name>`

`<FirstName>SUE</FirstName>`

`<LastName>SMITH</LastName>`

`</Name>`

#### Example 2

For Direct Loans, the Additional Unsubsidized Loan for Health Professionals Indicator, `<HPPAIndicator>`, is not necessary if the student does not qualify. In these cases, this tag should not be included in the document, rather than reported as empty.

## Data Types

The Common Record includes the following data types:

- Date
- Date/Time
- Year
- Year/Month
- Decimal
- Integer
- String
- Boolean

Each of these data types is discussed in detail below.

## DATE FIELDS

All date fields on the Common Record use the following format: CCYY-MM-DD. Dates that are not formatted using this format and the appropriate date range values will fail XML validation.

## BUSINESS RULES

1. The dashes must be included.
2. The **CC** designates the Century (19-20).
3. The **YY** designates the Year (00-99).
4. The **MM** designates the Month (01-12).
5. The **DD** designates the Day (01-31)

6. A leap year is defined as one in which the value of `YY` is divisible by four (4).
7. In a leap year, the valid values for `DD` are “01 – 29” when `MM` is equal to “02”.

## DATE/TIME FIELDS

All date/time fields on the Common Record use the following format: `CCYY-MM-DDThh:mm:ss.ff`.

### BUSINESS RULES

1. The punctuation marks (dashes, colons and decimal point) must be included.
2. The `CC` designates the Century (19-20).
3. The `YY` designates the Year (00-99).
4. The `MM` designates the Month (01-12).
5. The `DD` designates the Day (01-31).
6. The `T` is the date/time separator.
7. The `hh` designates the Hour.
8. The `hh` must be submitted in 24-hour clock time.
9. The `mm` designates the Minutes.
10. The `ss` designates the Seconds.
11. The `ff` designates the hundredths of a second. This value may be zero (00).

## YEAR FIELDS

All year fields on the Common Record use the following format: CCYY.

### BUSINESS RULES

1. The CC designates the Century.
2. The YY designates the Year.

## YEAR/MONTH FEILDS

All year/month fields on the Common Record use the following format: CCYY-MM.

### BUSINESS RULES

1. The CC designates the Century.
2. The YY designates the Year.
3. The MM designates the Month.

## DECIMAL FIELDS

Decimal fields on the Common Record are either dollar amount fields or percentage fields. Each of these field types is described in detail below.

## DOLLAR AMOUNT FIELDS

Dollar amount fields on the Common Record use the following format: -999999.99 to 999999999999.99.

### BUSINESS RULES

1. Leading zeroes are not necessary to occupy the maximum length of the field.
2. Dollar amount fields may include two digits to the right of a decimal point.
3. If a dollar amount reported by the school does not contain a decimal point, the COD System infers a decimal point and two zeroes after the last digit reported. Please see Example 1.
4. To report cents (partial dollar amounts), the school must submit a decimal point and the digits to the right of the decimal point. Please see Example 1.
5. When reporting a positive dollar amount, the school must submit amount fields without a sign indicator.
6. When reporting a negative dollar amount, the school must submit the amount field with the negative sign in the lead character. Please see Example 2.
7. Common Records may be returned to the source with a negative sign in the lead character of a dollar amount field, e.g. Payment to Servicer Amount. Please see Example 3.
8. The following fields on the Common Record are dollar amount fields:
  - a. Total Award Amount Reported, <TotalReportedAward>
  - b. Total Disbursement Amount Reported, <TotalReportedDisbursement>
  - c. Award Amount, <FinancialAwardAmount>
  - d. Award Amount Requested, <FinancialAwardAmountRequested>
  - e. Cost of Attendance, <AttendanceCost>
  - f. Direct Loan Cost of Attendance, <DirectLoanAttendanceCost>

Beginning with Award Year 2022 – 23 and forward, COD rejects all Direct Loan Cost of Attendance which is less than the Direct Loan Amount. Invalid Direct Loan Cost of Attendance will be rejected with existing edit 996.

- g. Disbursement Amount, <DisbursementAmount>
- h. Disbursement Net Amount, <DisbursementNetAmount>
- i. Disbursement Fee Amount, <DisbursementFeeAmount>
- j. Interest Rebate Amount, <InterestRebateAmount>
- k. Payment to Servicer Amount, <PaymentToServicerAmount>
- l. Booked Amount, <BookedAmount>
- m. Endorser Amount, <EndorserAmount>
- n. Year to Date Disbursement Amount, <YTDDisbursementAmount>
- o. Scheduled Grant, <ScheduledGrant>
- p. Negative Pending Amount, <NegativePendingAmount>
- q. Total Financial Disbursement Accepted, <TotalFinancialDisbursementAccepted>
- r. Total Financial Award Accepted, <TotalFinancialAwardAccepted>
- s. Total Funded Disbursement Accepted, <TotalFundedDisbursementAccepted>
- t. Total Non-Funded Disbursement Accepted, <TotalNonFundedDisbursementAccepted>
- u. Total Amount Corrected, <TotalFinancialAwardCorrected>

**Pennies:**

Pennies are not processed or stored by the COD System for the Direct Loan Program but are processed and stored for the Pell and TEACH Grant Programs. All Direct Loan reported amounts that include partial dollar amounts are truncated. Please refer to the Reporting Pennies in the Award and Disbursement Amount Data Elements topic for more information.

**Example 1**

When reporting an amount of \$2625.34:

1. Include the decimal point and two digits to the right: 2625.34

OR

2. Include the decimal point and two zeroes to the right: 2625.00

OR

3. Omit the decimal point and report the whole dollar amount only: 2625

Then, the COD System infers a decimal point and two zeroes and stores as 2625.00.

Do **not** submit 262500 as the COD System infers a decimal and stores this submission as 262500.00.

#### Example 2

The Payment to Servicer Amount is returned with a negative sign as the lead character in the amount field.

```
<PaymentToServicerAmount>-1000.00</PaymentToServicerAmount>
```

## Percentage Fields:

Percentage fields on the Common Record use the following format: 0 – 999.999.

### BUSINESS RULES

1. Leading zeroes are not necessary to occupy the maximum length of the field.
2. Percentages must be reported as whole numbers or mixed numbers without the percent sign.
3. The following fields on the Common Record are percentage fields:
  - a. Origination Fee Percentage, <OriginationFeePercent>
  - b. Interest Rebate Percentage, <InterestRebatePercent>
  - c. Total Eligibility Used, <TotalEligibilityUsed>
  - d. Lifetime Eligibility Used <LifetimeEligibilityUsed>

#### Format and Valid Values:

Please refer to *Volume 2, Section 3 - Common Record Layout* for more information on valid values and formats on specific fields.

### Examples

Three percent (3%) is reported as 3 or 3.0 and the COD System stores as 3.000. One and a half percent (1.5%) is reported as 1.5 and the COD System stores as 1.500.

## INTEGER FIELDS

Integer fields on the Common Record are non-dollar amounts, non-percentages, numeric fields.

### BUSINESS RULES

1. Integer fields contain whole numbers.
2. Integer fields do not contain decimal points, dollar or percent signs.

## STRING FIELDS

String fields on the Common Record are alphanumeric fields that can contain a variety of characters.

### BUSINESS RULES

1. String fields can contain all ASCII characters, except a raw unescaped opening angle bracket (<), ampersand (&), closing angle bracket (>), quotation mark ("), or apostrophe (').

## BOOLEAN FIELDS

Boolean fields on the Common Record are fields that have exactly two values: true or false.

### BUSINESS RULES

1. Boolean fields contain a value of true or false.



## XML PREDEFINED ENTITY REFERENCES

Refer to the XML Predefined Entity References topic for more information.

XML does not allow character data inside an element to contain a raw unescaped opening angle bracket (<), ampersand (&), closing angle bracket (>), quotation mark ("), or apostrophe ('). If these characters are necessary in your markup, they must be escaped using predefined entity references. An XML parser replaces the predefined entity references with actual characters.

XML predefines the following five entity references:

- &lt;the less than sign (<)
- &amp;the ampersand (&)
- &gt;the greater than sign (>)
- &quot;the straight, double quotation marks (")
- &apos;the apostrophe, straight quotation mark (')

# Common Record Processing Rules

## DOCUMENT

An XML document is the vehicle through which data is transmitted. A Common Record transmission is considered to be an XML document. A Common Record transmission, or document, may contain multiple awards and multiple disbursements for one or multiple students. In cases where the Reporting School transmits data for multiple Attended Schools, the Common Record may contain student, award, and disbursement data for multiple schools. It can be thought of as a batch.

## DOCUMENT SUBMISSION

Common Record documents can be submitted to the COD System via Batch Processing or the COD Website.

## BATCH PROCESSING

EDConnect Users: EDconnect users must upgrade to EDconnect version 5.3 or higher for their records not to reject. The most recent version of EDconnect available is v8.6.0.

All documents submitted via batch processing must be submitted via the Electronic Data Exchange over the Student Aid Internet Gateway (SAIG). For further information, please refer to the SAIG Host Communication Guide located at <https://fsapartners.ed.gov/knowledge-center/topics/software-and-other-tools>.

## BUSINESS RULES

1. All documents submitted via batch processing must be submitted via the Student Aid Internet Gateway (SAIG).
2. Each transmission must have an SAIG transmission batch header (O\*N05) and trailer (O\*N95) record.
3. Each transmission can include the SAIG transmission header (O\*N01) and trailer (O\*N99) record. Inclusion of the SAIG transmission header (O\*N01) and trailer (O\*N99) record is optional and is not required for COD processing.
4. Only one set of Common Record begin and end tags can be submitted within each SAIG transmission batch header (O\*N05) and trailer (O\*N95) pair.
5. If more than one set of Common Record begin and end tags is submitted within SAIG transmission batch header (O\*N05) and trailer (O\*N95) pair, COD rejects the document with error code 105.

6. Multiple pairs of SAIG transmission batch headers (O\*N05) and trailers (O\*N95) can be submitted within the SAIG transmission headers (O\*N01) and trailers (O\*N99). Please see example below.
7. The variable length Batch Number field on the SAIG Transmission batch header (O\*N05) and trailer (O\*N95) occupies positions 42-91.
  - a. Positions 42-61 are reserved for school use.
  - b. Positions 62-91 are reserved for Department of Education use.
  - c. COD populates positions 62-91 with the 30-character Common Record Document ID on all response records. If the school populates any data in positions 62-91 on the incoming record, COD will overwrite this data with the Document ID on the response record.

**Separate Originations and Disbursements:**

When submitting new origination and disbursement information in separate documents, schools should wait to receive a response for the originations prior to sending in disbursement information. Otherwise, the disbursements may reject.

**Note:** Schools should check with their software provider for the correct procedure that is applicable to their system.

**Example**

N01 - Transmission Header

N05 - Transmission Batch Header

```
<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c"
```

N95 - Transmission Batch Trailer N05 - Transmission Batch Header

```
<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c"
```

N95 - Transmission Batch Trailer N99 - Transmission Trailer

## COD MESSAGE CLASSES

For information on the message classes, please refer to Volume 2, Section 2 - COD Message Classes in this technical reference.

## LOGICAL RECORD LENGTH LIMITATION

For information and recommended solutions concerning the 32-kilobyte file length limitation on mainframe systems and the 9,999 byte limitation on the COD System, refer to the Common Record Physical Record Layout topic within Volume 2, Section 3 - Common Record Layout in this technical reference.

## COD RECEIPTS

In March 2016, the COD System stopped generating and sending receipts for Common Record documents received via SAIG.

## RESPONSE DOCUMENTS

For all Common Records received and processed by the COD System, the COD System returns a Response document indicating the status of Common Record processing, including any rejected data elements and reason(s) for the rejection(s).

### **EDExpress Dates:**

Although EDExpress accepts any date on or after 10/01/2023, the valid 2024-25 date range for disbursement records is from the date the 2024-25 Pell schedules are posted on the Knowledge Center Website ([fsapartners.ed.gov/knowledge-center](https://fsapartners.ed.gov/knowledge-center)) to 09/30/2030.

## BUSINESS RULES

1. The COD System sends one Response document for each Common Record document processed by the COD System.
2. A Response complex element is generated for each major complex element reported on a Common Record document: Document, Reporting School, Attended School, Student, Award, and Disbursement.
3. All Response complex elements are nested within the Response document.
4. Schools have an option to receive a Full or Standard Response to Common Records processed by the COD System.

- a. A Full Response contains all the original tags sent by the School, the rejected data elements and reason codes, and additional calculations performed by COD during processing.
  - b. A Standard Response contains the rejected data elements and reason codes and calculations performed by COD during processing.
  - c. This option defaults to a Standard Response.
5. Schools can override this option on a record-by-record basis by submitting the `<FullResponseCode>` tag on the Common Record.
- a. If the `<FullResponseCode>` tag is not sent, the option defaults to Standard Response.
6. For Common Records transmitted via SAIG, the COD System sends Response Documents to the school's SAIG mailbox.
7. For Common Records transmitted via the web, schools have an option to receive a response either via the web only, or via the web and their SAIG mailbox.
- a. Unless the school changes the web activity response option on the [COD Website's](#) School Options Page, the school will receive a response via the web only.
  - b. A response via the web will only indicate whether the record was accepted or rejected and will not contain submitted data elements.
  - c. Schools that do not wish to receive a response via the web must change this option for each program.
  - d. Schools that chose to receive a response for web activity via their SAIG mailbox will receive a Full Response.

If the school sends the Common Record via	The school will receive a response via
SAIG Mailbox	SAIG Mailbox
COD Website	COD Website only or COD Website and SAIG Mailbox

Table 0-1

**Example:**

The following diagram illustrates how a Response complex element is generated for every complex element of data submitted on the Common Record and the nesting of those complex elements within the Response Document:

Common Record

Reporting School

Attended School

Student

Award

Award Response

Disbursement

Disbursement Response

Student Response

Attended School Response

Reporting School Response

Common Record Response

## RESPONSE CODE

For each Response complex element returned, the COD System generates a Response Code that indicates whether the complex element was accepted, rejected, or corrected. The Response complex element and Response Code is returned for each major complex element: Reporting School, Attended School, Person, Award, and Disbursement.

## BUSINESS RULES

1. The COD System returns a Response complex element with a Response Code of A (Accepted), R (Rejected), or C (Corrected).
2. A Response complex element with a Response Code of A (Accepted) is returned to indicate that the complex element was accepted.

3. A Response complex element with a Response Code of A (Accepted) may have a warning edit returned on the complex element.
4. A Response complex element with a Response Code of A (Accepted) does not exclude another complex element in the hierarchy from being accepted, corrected, or rejected.
  - a. If a Person complex element is Accepted, this does not exclude the possibility that the Award or Disbursement complex elements may be accepted, corrected, or rejected.
  - b. If an Award complex element is Accepted, this does not exclude the possibility that the Person or Disbursement complex elements may be accepted, corrected, or rejected. Response complex element with a Response Code of R (Rejected) is returned to indicate that the data elements in the complex element are rejected.
5. A Response complex element with a Response Code of R (Rejected) is returned with at least one reject edit.
6. A Response complex element with a Response Code of R (Rejected) can result in other complex elements being rejected.
  - a. On the initial submission of the Document, a Response Code of R (Rejected) is returned if the Common Record document does not meet the rules of the XML Common Record Schema.
  - b. On the initial submission of a Person, if a Person complex element is rejected, then the Award complex element is rejected, even if all data in the Award complex element passed the edits, because the COD System cannot accept an Award complex element without an established Person.
  - c. On the initial submission of a Person, if all Award complex elements in the submission are rejected, then the Person complex element is rejected, because the COD System cannot accept a Person complex element without at least one established Award.
  - d. On an initial submission of an Award, if an Award complex element is rejected, then the Disbursement complex element is rejected, even if all data in the Disbursement complex element passed the edits, because the COD System cannot accept the Disbursement complex element without an established Award.
7. Response complex element with a Response Code of C (Corrected) is returned only when at least one data element within the complex element has been corrected. Beginning in October 2016, the COD System introduced correcting logic to Direct Loan processing for all schools. The COD System corrects Pell Grant Award and Disbursement data for schools that choose to have their data corrected rather than rejected. A `<ResponseCode>` of C may be returned only in these complex elements:
  - a. A Response complex element with a Response Code of C (Corrected) does not preclude another complex element in the hierarchy from being accepted, corrected, or rejected.
  - b. If an Award complex element is corrected, this does not exclude the possibility that the Disbursement complex element may be accepted, corrected, or rejected.
  - c. If a Disbursement complex element is corrected, this does not exclude the possibility that the Award complex element may be accepted, corrected, or rejected.

Example

Complex Element	Processed with Edits	Response Code
Person	No	A (Accepted)
Award (1)	No	A (Accepted)
Disbursement (for Award 1)	No	A (Accepted)

Table 0-2

Complex Element	Processed with Edits	Response Code
Person	No	A (Accepted)
Award (1)	Yes (with corrections)	C (Corrected)
Disbursement (for Award 1)	No	A (Accepted)

Table 0-3

Complex Element	Processed With Edits	Response Code
Person	No	R (Rejected) Because no Awards were accepted
Award (1)	Yes	R (Rejected)
Disbursement (for Award 1)	No	R (Rejected) Because the Award was not accepted

Table 0-4



Complex Element	Processed With Edits	Response Code
Person	No	A (Accepted) Because at least one Award was accepted
Award (1)	No	A (Accepted)
Award (2)	Yes	R (Rejected)
Disbursement (for Award 2)	No	R (Rejected) Because the Award was not accepted

Table 0-5

## STORING OF REJECT RECORDS

The COD System does not store records that have rejected at the Document (Batch) and Entity level including XML validation failures. The COD System does store Document and Entity data from records that have been rejected at the Person, Award, or Disbursement level. Records that have rejected at the Person, Award, and/or Disbursement levels can be viewed on the COD Website.

### BUSINESS RULES

1. Schools may view their rejected records on the [COD Website](#).
2. Rejected records are not included in any COD Reports.

## DOCUMENT VALIDATION

If a document does not validate against the XML Common Record Schema, the COD System does not process the document.

For more information please refer to the Document ID Required for Document Submission, Sequence of Data Elements Required for Document Processing, and Document Submission topics of this Technical Reference.

### BUSINESS RULES

1. The COD System contains a validation program that ensures that the Common Record documents are well formed and properly structured.
2. The COD System process the Common Record Document using the XML schema version indicated by the Common Record tag.
3. If tags are identified that are not specific to the XML schema version used for processing, the document is considered invalid and Customer Service is notified of the error. Customer Service works with the school to avoid future processing problems.

4. The COD System does not process a document if:
  - a. The Document ID is missing or incomplete
  - or
  - b. The document structure does not meet the rules of the XML Common Record Schema
  - or
  - c. More than one Common Record document is inserted between an SAIG Transmission Batch Header (O\*N05) and Trailer (O\*N95) pair.
5. When a Common Record is submitted with a missing or incomplete Document ID, the COD System cannot return a response to the sender.
6. When a Common Record document does not meet the rules of the XML Common Record Schema, the COD System will not return a response to the sender. However, an error response file will be returned to the sender containing reject edit 210. More information regarding the error response file can be found in the “Common Record XML Schema Guidelines” section of the Implementation Guide.
7. When more than one Common Record is inserted between an SAIG Transmission Batch Headers (O\*N05) and Trailer (O\*N95) pair, the COD System returns a Response with Reject Edit 105 and message.

## SEQUENCE OF DATA ELEMENTS REQUIRED FOR DOCUMENT PROCESSING

The sequence of data within the Common Record is dictated by the sequence of data elements presented in the XML Common Record Schema.

### BUSINESS RULES

1. Data elements submitted by a school must occur in the same sequence as depicted in the XML Common Record Schema.
2. A Common Record submitted with data elements out of sequence will not validate against the XML Common Record Schema and will therefore be rejected.

## DOCUMENT ID REQUIRED FOR DOCUMENT SUBMISSION

The COD System checks to ensure the Document ID is present and is properly formatted.

### Document ID Formatting:

Please refer to *Volume 2, Section 3 - Common Record Layout* in this *Technical Reference* for proper format of the Document ID.

## BUSINESS RULES

1. Document ID is an essential element for importing, storing and tracking the data submitted in a Common Record Document by a school.
2. The COD System does not process documents that do not have a Document ID.
3. The COD System does not process documents that have an incomplete Document ID.
4. The COD System does not process documents that have an invalid Document ID format.
5. The Routing ID listed in the Document ID must be the same Routing ID as the Source Routing ID.
6. The COD System is unable to store a Common Record document that has an invalid, incomplete, or missing Document ID.
7. The COD System cannot return a response to a sender that submits an invalid, incomplete, or missing Document ID.

## DUPLICATE DOCUMENT IDS

The COD System checks the Document ID for duplicates on the COD database.

## BUSINESS RULES

1. Document ID is defined as the DateTime stamp and the Source Routing ID.
2. A duplicate document is defined as a document that has a Document ID identical to one already established on the COD System.
3. The COD System rejects the document if the Document ID is a duplicate.
4. A rejected Document ID cannot be resubmitted as the COD System will recognize it as a duplicate.
5. The COD System generates a Response with Reject Edit 003 for documents with duplicate Document IDs. The Response does not contain detail data elements.

## INABILITY TO PROCESS FUTURE-DATED DOCUMENTS

The COD System confirms that the date portion of the Document's Created DateTime is not greater than the System Date.

### BUSINESS RULES

1. If the date portion of the Document's Created DateTime is greater than the System Date, the COD System rejects the document with Reject Edit 006.
2. The COD System generates a Response for future-dated documents.
3. Schools located across the international dateline should resubmit documents rejected with Reject Edit 006.

## DOCUMENTS SUBMITTED MUST CONTAIN AT LEAST ONE DETAILED RECORD

A detailed record consists of at least one Student Identifier and one Award. A Student Identifier consists of the student tag and three attributes: Social Security Number, Date of Birth, and Last Name.

### Additional Information:

For more information, please refer to the *Student Identifier* topic. For more information on the Award, please refer to the *Minimum Data Elements Required for Document Processing* topic.

### BUSINESS RULES

1. The COD System rejects the document if it does not contain at least one detailed record.
  - a. A detailed record on a New record is defined as at least one Student Identifier (Social Security Number, Date of Birth and Last Name) and one Award tag.
  - b. A detailed record on an Update record is defined as at least one Student Identifier (Social Security Number, Date of Birth and Last Name) and one Award tag.
2. The COD System generates a Response with Reject Edit 007 for documents with no detailed records.

## DOCUMENT SUBMISSIONS OF ONE DETAILED RECORD

The COD System is designed to process a large number of detailed records at one time when submitted together in a Common Record document. Standard school practice when submitting records is to submit a large quantity of records at once, in one document. The design of the COD System incorporates this common school practice with its batch processing functionality.

### BUSINESS RULES

1. The COD System will accept and process single detailed record documents, but the system is not designed to regularly process multiple Common Record document submissions of one record each.
2. Processing time increases with submission of multiple documents of one detailed record each.
  - a. The time it takes the COD System to process a Common Record document is affected by the amount of time it takes to process the individual components of the document:
    - i. The SAIG batch header and trailer
    - ii. The records contained within the document
  - b. The time it takes the COD System to process each record within a Common Record document is minimal in comparison to the time it takes the COD System to process the batch header and trailer.
  - c. The processing time for the batch header and trailer does not vary with document size. The batch header and trailer will be processed in the same amount of time by the COD System for a document containing one detailed record as for a document containing 50 records.
  - d. Processing time for multiple records submitted in individual Common Record documents will take significantly more time than it takes to process the same number of records submitted together in one Common Record document. For example, it will take much longer for the COD System to process 50 documents of one record each than one document containing 50 records.
3. Multiple document submissions each containing one individual record will delay processing of all schools' records submitted after the group of single record documents.
4. The COD System will NOT reject document submissions containing only one record.
5. Document submissions containing only one record should be submitted on an exception basis only.
6. The [COD Website](#) is designed to accommodate record submission on a record-by-record basis. Schools may submit multiple individual records to the COD System via the COD Website without experiencing processing delays.

## DOCUMENT SUBMISSIONS OF MULTIPLE DETAILED RECORDS

The COD System is designed to process a large number of detailed records at one time when submitted together in a Common Record document. Standard school practice when submitting records is to submit a large quantity of records at once in one document. The design of the COD System incorporates this common school practice with its batch processing functionality.

### BUSINESS RULES

1. The COD System will NOT reject document submissions containing multiple records.
2. Batches containing greater than 50,000 records may not be viewable via the [COD Website](#).
3. Prior to sending a batch with multiple records to COD, ensure that your system will be able to import the common record response containing multiple records.

## MINIMUM DATA ELEMENTS REQUIRED FOR DOCUMENT PROCESSING

The COD System requires certain data elements for processing each complex element of the document. Depending on the scenario, different minimum data elements may be required for document processing.

The bolded fields below are generic examples for the actual value used to replace “source.” For more information, refer to Volume 2, Section 3 - Common Record Layout.

### Required Elements for Document Processing:

Beginning in March 2015, the **<SoftwareProvider>** and **<SoftwareVersion>** tags are required upon origination and maintenance. If they are not submitted, or submitted blank, the COD System will reject the record with reject Edit 218.

## BUSINESS RULES

1. The following data elements are required for processing a change to Student demographic data for a Pell or TEACH Grant Award:

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c"
```

```
<TransmissionData>
```

```
<DocumentID
```

```
<CreatedDateTime>
```

```
<Source>
```

```
<RoutingID>
```

```
<Destination>
```

```
<RoutingID>
```

```
<Software>
```

```
<SoftwareProvider>
```

```
<SoftwareVersion>
```

```
<ReportingSchool>
```

```
<RoutingID>
```

```
<ReportedFinancialSummary>
```

```
<FinancialAwardType>
```

```
<TotalCount>
```

```
<AttendedSchool>
```

```
<RoutingID>
```

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<Pell> (*Pell only*)

<TEACH> (*TEACH Grant only*)

<FinancialAwardYear>

<FinancialAwardNumber> (*TEACH grant only*)

<FinancialAwardID> (*TEACH grant only*)

<FPSTransactionNumber>

2. The following data elements are required for processing a change to Student demographic data for a Direct Loan Subsidized or Unsubsidized Award:

<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

<TransmissionData>

<DocumentID>

<CreatedDateTime>

<Source>

<RoutingID>

<RoutingID>

<Software>



<SoftwareProvider>

<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<TotalCount>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<DLSubsidized> or <DLUnsubsidized>

<FinancialAwardYear>

<FinancialAwardNumber>

<FinancialAwardID>

<FPSTransactionNumber>

---

**Required Tags:**

For the Direct Loan Program, COD will return edit 996 if tags are not submitted in the correct block, per the award year.

3. The following data elements are required for processing a change to Student demographic data for a Direct PLUS Loan (parent borrower and graduate/professional student borrower) Award:

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">
```

```
<TransmissionData>
```

```
<DocumentID>
```

```
<CreatedDateTime>
```

```
<Source>
```

```
<RoutingID>
```

```
<Destination>
```

```
<RoutingID>
```

```
<Software>
```

```
<SoftwareProvider>
```

```
<SoftwareVersion>
```

```
<ReportingSchool>
```

```
<RoutingID>
```

```
<ReportedFinancialSummary>
```

```
<FinancialAwardType>
```

```
<TotalCount>
```

```
<AttendedSchool>
```

```
<RoutingID>
```

```
<Student>
```

<Index>

<SSN>

<BirthDate>

<LastName>

<DLPLUS>

<FinancialAwardYear>

<FinancialAwardNumber>

<FinancialAwardID>

<Borrower>

<Index>

<SSN>

<BirthDate>

<LastName>

<FPSTransactionNumber>

#### Student-Centric COD Database:

The COD database is student centric. Changing the student demographic data for one award year and award type will change it for all award years and award types for that student. Please refer to the *Changing Student Identifier Information* topic for more information about submitting changes to the Student Identifier.

- a. The following data elements are required in addition to the minimum required tags for a new credit check on an origination for domestic addresses:

<BorrowerSSN>

<BorrowerLastName>

<BorrowerDOB>

<AddressLine>

<City>

<StateProvinceCode>

<PostalCode>

<FPSTransactionNumber>

### Processing Address Information:

For ALL awards – complete address information must be submitted in the incoming record.

- b. The following data elements are required in addition to the minimum required tags for a new credit check on an origination for foreign addresses:

<BorrowerSSN>

<BorrowerLastName>

<BorrowerDOB>

<AddressLine>

<City>

<Country>

<FPSTransactionNumber>

4. The following data elements are required for processing a Direct Loan Subsidized or Unsubsidized Award:

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">
```

```
<TransmissionData>
```

<DocumentID>

<CreatedDateTime>

<Source>

**<RoutingID>**

<Destination>

**<RoutingID>**

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<FinancialAwardYear>

<TotalCount>

<TotalReportedAward>

<TotalReportedDisbursement>

<AttendedSchool>

**<RoutingID>**

<Software>

<SoftwareProvider>

<SoftwareVersion>

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<Contacts>    *(Required only if address tags are included)*

\*<PermanentAddress> or <TemporaryAddress>    *(Required only if address tags are included)*

\*<AddressLine>

\*<City>

\*<StateProvinceCode>    *(Address is domestic)*

\*<PostalCode>

\*<CountryCode>    *(Address is international)*

<DLLoanInformation AwardKey="">

<OriginationFeePercent>

<InterestRebatePercent>

<StudentLevelCode>

<FinancialAwardBeginDate>

<FinancialAwardEndDate>

<AcademicYearBeginDate>

<AcademicYearEndDate>

<DLSubsidized> or <DLUnsubsidized>

<AwardKey>

<FinancialAwardYear>

<FPSTransactionNumber>

<FinancialAwardAmount>  
<DependencyStatusCode>  
<FinancialAwardNumber>  
<FinancialAwardID>  
<DirectLoanAttendanceCost>  
<FinancialAwardCreateDate>  
<AdditionalUnsubsidizedEligibilityIndicator>  
<StudentEligibilityCode><Disbursement>  
<Disbursement Number="">  
<DisbursementAmount>  
<DisbursementDate>  
<DisbursementReleaseIndicator>  
<DisbursementSequenceNumber>  
<EnrollmentSchoolCode>  
<PaymentPeriodStartDate>  
<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*  
<EnrollmentStatus>  
CIP Number="">  
<ProgramCIPCode>  
<PublishedPgmLengthYears>  
<SpecialPrograms>  
<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

<DisbursementNetAmount>

<DisbursementFeeAmount>

<InterestRebateAmount>

**Additional Unsubsidized Eligibility Indicator:**

*This tag is only required for DL Unsubsidized awards.*

**Address Tags:**

The tags marked with a \* do not have to be submitted with the incoming record if it is found and pulled from the COD database or FPS.

5. The following data elements are required for processing a Direct PLUS Loan (parent borrower and graduate/professional student borrower) Award:

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">
```

```
<TransmissionData>
```

```
<DocumentID>
```

```
<CreatedDateTime>
```

```
<Source>
```

```
<RoutingID>
```

```
<Destination>
```

```
<RoutingID>
```

```
<Software>
```

```
<SoftwareProvider>
```



<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<FinancialAwardYear>

<TotalCount>

<TotalReportedAward>

<TotalReportedDisbursement>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<DLLoanInformation AwardKey="">

<OriginationFeePercent>

<InterestRebatePercent>

<StudentLevelCode>

<FinancialAwardBeginDate>

<FinancialAwardEndDate>

<AcademicYearBeginDate>

<AcademicYearEndDate>

<DLPLUS>

<AwardKey>

<FinancialAwardYear>

<FinancialAwardAmount>

<DependencyStatusCode>

<DefaultOverpayCode>

<FinancialAwardNumber>

<FinancialAwardID>

<DirectLoanAttendanceCost>

<FinancialAwardCreateDate>

<FinancialAwardAmountRequested>

<StudentEligibilityCode>

<Borrower>

<Index>

<SSN>

<BirthDate>

<LastName>

<PersonIdentifiers>

<FirstName>

<Contacts> (Required only if address tags are included)

\*<PermanentAddress> or <TemporaryAddress> (Required only if address tags are included)

\*<AddressLine>

\*<City>

\*<StateProvinceCode> (Address is domestic)

\*<PostalCode>

\*<CountryCode> (Address is international)

<Citizenship>

<CitizenshipStatusCode> (This tag is for student and borrower)

<DefaultOverpayCode>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate>

<PaymentPeriodEndDate> (Required for award years 2022-23 and forward)

<EnrollmentStatus>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

<DisbursementNetAmount>

<DisbursementFeeAmount>

<InterestRebateAmount>

#### Address Tags:

The tags marked with a \* do not have to be submitted with the incoming record if it is found and pulled from the COD database or FPS.

6. The following data elements are required for processing a change to a Direct Loan (Subsidized, Unsubsidized, or PLUS) Award:

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c
http://www.ed.gov/FSA/COD/2024/v5.0c">
```

<TransmissionData>

<DocumentID>

<CreatedDateTime>

<Source>

<RoutingID>

<Destination>

<RoutingID>

<Software>

<SoftwareProvider>

<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<FinancialAwardYear>

<TotalCount>

<TotalReportedAward>

<TotalReportedDisbursement>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<DLSubsidized> or <DLUnsubsidized> or <DLPLUS>

<FinancialAwardYear>

<FinancialAwardAmount>

<FinancialAwardNumber>

<FinancialAwardID>

<DirectLoanAttendanceCost> *(Required for award years 2022-2023 and forward)*

<Borrower> *(PLUS only)*

<Index>

<SSN>

<BirthDate>

<LastName>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate>

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

<DisbursementNetAmount>

<DisbursementFeeAmount>

<InterestRebateAmount>

7. The following data elements are required for processing a Direct Loan anticipated disbursement (Disbursement Release Indicator set to false):

<?xml version="1.0" encoding="UTF-8"?>

<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

<TransmissionData>

<DocumentID>

<CreatedDateTime>

<Source>

**<RoutingID>**

<Destination>

**<RoutingID>**

<Software>

<SoftwareProvider>

<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<FinancialAwardYear>

<TotalCount>

<TotalReportedAward>

<TotalReportedDisbursement>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<DLSubsidized> or <DLUnsubsidized> or <DLPLUS>

<FinancialAwardYear>

<FinancialAwardNumber>

<FinancialAwardID>

DirectLoanAttendanceCost>

<Borrower> (*PLUS only*)

<Index>

<SSN>

<BirthDate>



<LastName>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate>

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

<DisbursementNetAmount>

<DisbursementFeeAmount>

<InterestRebateAmount>

8. The following data elements are required for processing a Direct Loan actual disbursement (Disbursement Release Indicator set to true):

```
<?xml version="1.0" encoding="UTF-8"?>

<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

  <TransmissionData>

    <DocumentID>

    <CreatedDateTime>

    <Source>

    <RoutingID>

    <Destination>

    <RoutingID>

    <Software>

    <SoftwareProvider>

    <SoftwareVersion>

    <ReportingSchool>

    <RoutingID>

    <ReportedFinancialSummary>

    <FinancialAwardType>

    <FinancialAwardYear>

    <TotalCount>

    <TotalReportedAward>

    <TotalReportedDisbursement>
```

<AttendedSchool>

<**RoutingID**>

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<DLSubsidized> **or** <DLUnsubsidized> **or** <DLPLUS>

<FinancialAwardYear>

<FinancialAwardNumber>

<FinancialAwardID>

<DirectLoanAttendanceCost> *(Required for award years 2022-23 and forward)*

<Borrower> *(PLUS only)*

<Index>

<SSN>

<BirthDate>

<LastName>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

```
<DisbursementSequenceNumber>  
  
<EnrollmentSchoolCode>  
  
<PaymentPeriodStartDate>  
  
<PaymentPeriodEndDate> (Required for award years 2022-23 and forward)  
  
<EnrollmentStatus>  
  
<CIP Number="">  
  
<ProgramCIPCode>  
  
<PublishedPgmLengthYears>  
  
<SpecialPrograms>  
  
<ProgramCredentialLevel>  
  
</CIP>  
  
<ProgramCIPCodeYear>  
  
<DisbursementNetAmount>  
  
<DisbursementFeeAmount>  
  
<InterestRebateAmount>
```

9. The following data elements are required for processing a Pell Grant Award:

```
<?xml version="1.0" encoding="UTF-8"?>  
  
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"  
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">  
  
<TransmissionData>  
  
<DocumentID>
```

<CreatedDateTime>

<Source>

**<RoutingID>**

<Destination>

**<RoutingID>**

<Software>

<SoftwareProvider>

<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<TotalCount>

<TotalReportedAward>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<Contacts> *(Required only if address tags are included)*

\*<PermanentAddress> or <TemporaryAddress> (Required only if address tags are included)

\*<AddressLine>

\*<City>

\*<StateProvinceCode> (Address is domestic)

\*<PostalCode>

\*<CountryCode> (Address is international)

<Pell>

<FinancialAwardYear>

<FPSTransactionNumber>

<FinancialAwardAmount>

<AttendanceCost>

<EnrollmentDate>

<StudentEligibilityCode>

<VerificatonStatusCode>

### Address Tags:

The tags marked with a \* do not have to be submitted with the incoming record if it is found and pulled from the COD database or FPS.

10. The following data elements are required for processing a change to a Pell Grant Award:

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">
```

```
<TransmissionData>
```

```
<DocumentID>
```

<CreatedDateTime>

<Source>

**<RoutingID>**

<Destination>

**<RoutingID>**

<Software>

<SoftwareProvider>

<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<TotalCount>

<TotalReportedAward>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<Pell>

<FinancialAwardYear>

<FinancialAwardAmount>

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

*(Required only if there was a period of ineligibility at the school)*

11. The following data elements are required for processing a Pell Grant anticipated disbursement (Disbursement Release Indicator set to false):

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">
```

<TransmissionData>

<DocumentID>

<CreatedDateTime>

<Source>

**<RoutingID>**

<Destination>

**<RoutingID>**

<Software>

<SoftwareProvider>

<SoftwareVersion>

<ReportingSchool>

**<RoutingID>**



<ReportedFinancialSummary>

<FinancialAwardType>

<TotalCount>

<TotalReportedAward>

<TotalReportedDisbursement>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<Pell>

<FinancialAwardYear>

<FPSTransactionNumber>

<FinancialAwardAmount>

<AttendanceCost>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<EnrollmentIntensity>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

12. The following data elements are required for processing a Pell Grant actual disbursement (Disbursement Release Indicator set to true):

<?xml version="1.0" encoding="UTF-8"?>

<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

<TransmissionData>

<DocumentID>

<CreatedDateTime>

<Source>

**<RoutingID>**

&lt;Destination&gt;

**<RoutingID>**

&lt;Software&gt;

&lt;SoftwareProvider&gt;

&lt;SoftwareVersion&gt;

&lt;ReportingSchool&gt;

**<RoutingID>**

&lt;ReportedFinancialSummary&gt;

&lt;FinancialAwardType&gt;

&lt;TotalCount&gt;

&lt;TotalReportedAward&gt;

&lt;TotalReportedDisbursement&gt;

&lt;AttendedSchool&gt;

**<RoutingID>**

&lt;Student&gt;

&lt;Index&gt;

&lt;SSN&gt;

&lt;BirthDate&gt;

&lt;LastName&gt;

&lt;Pell&gt;

&lt;FinancialAwardYear&gt;

<FPSTransactionNumber>

<FinancialAwardAmount>

<AttendanceCost>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<EnrollmentIntensity>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

## 13. The following data elements are required for processing a TEACH Grant Award:

```
<?xml version="1.0" encoding="UTF-8"?>

<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

  <TransmissionData>

    <DocumentID>

    <CreatedDateTime>

    <Source>

    <RoutingID>

    <Destination>

    <RoutingID>

    <Software>

    <SoftwareProvider>

    <SoftwareVersion>

    <ReportingSchool>

    <RoutingID>

    <ReportedFinancialSummary>

    <FinancialAwardType>

    <TotalCount>

    <TotalReportedAward>

    <AttendedSchool>

    <RoutingID>
```

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<Contacts>    *(Required only if address tags are included)*

\*<PermanentAddress> or <TemporaryAddress>    *(Required only if address tags are included)*

\*<AddressLine>

\*<City>

\*<StateProvinceCode>        *(Address is domestic)*

\*<PostalCode>

\*<CountryCode>        *(Address is international)*

<TEACH>

<FinancialAwardYear>

<FPSTransactionNumber>

<FinancialAwardAmount>

<FinancialAwardNumber>

<FinancialAwardID>

<EnrollmentDate>

<StudentEligibilityCode>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

#### Address Tags:

The tags marked with a \* do not have to be submitted with the incoming record if it is found and pulled from the COD database or FPS.

## 14. The following data elements are required for processing a change to a TEACH Grant Award:

```
<?xml version="1.0" encoding="UTF-8"?>

<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

  <TransmissionData>

    <DocumentID>

    <CreatedDateTime>

    <Source>

    <RoutingID>

    <Destination>

    <RoutingID>

    <Software>

    <SoftwareProvider>

    <SoftwareVersion>

    <ReportingSchool>

    <RoutingID>

    <ReportedFinancialSummary>

    <FinancialAwardType>

    <TotalCount>

    <TotalReportedAward>

    <TotalReportedDisbursement>

    <AttendedSchool>
```



**<RoutingID>**

&lt;Student&gt;

&lt;Index&gt;

&lt;SSN&gt;

&lt;BirthDate&gt;

&lt;LastName&gt;

&lt;TEACH&gt;

&lt;FinancialAwardYear&gt;

&lt;FPSTransactionNumber&gt;

&lt;FinancialAwardAmount&gt;

&lt;FinancialAwardNumber&gt;

&lt;FinancialAwardID&gt;

&lt;Disbursement&gt;

&lt;Disbursement Number=""&gt;

&lt;DisbursementAmount&gt;

&lt;DisbursementDate&gt;

&lt;DisbursementReleaseIndicator&gt;

&lt;DisbursementSequenceNumber&gt;

&lt;EnrollmentSchoolCode&gt;

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

```
<EnrollmentStatus>  
  
<CIP Number="">  
  
<ProgramCIPCode>  
  
<PublishedPgmLengthYears>  
  
<SpecialPrograms>  
  
<ProgramCredentialLevel>  
  
</CIP>  
  
<ProgramCIPCodeYear>
```

15. The following data elements are required for processing a TEACH Grant anticipated disbursement (Disbursement Release Indicator set to false):

```
<?xml version="1.0" encoding="UTF-8"?>  
  
<CommonRecord xmlns=" http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"  
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">  
  
<TransmissionData>  
  
<DocumentID>  
  
<CreatedDateTime>  
  
<Source>  
  
<RoutingID>  
  
<Destination>  
  
<RoutingID>  
  
<Software>  
  
<SoftwareProvider>  
  
<SoftwareVersion>
```

<ReportingSchool>

**<RoutingID>**

<ReportedFinancialSummary>

<FinancialAwardType>

<TotalCount>

<TotalReportedAward>

<TotalReportedDisbursement>

<AttendedSchool>

**<RoutingID>**

<Student>

<Index>

<SSN>

<BirthDate>

<LastName>

<TEACH>

<FinancialAwardYear>

<FinancialAwardNumber>

<FinancialAwardID>

<FPSTransactionNumber>

<FinancialAwardAmount>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

**16. The following data elements are required for processing a TEACH Grant actual disbursement (Disbursement Release Indicator set to true):**

<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">

<TransmissionData>

<DocumentID>

<CreatedDateTime>

<Source>

**<RoutingID>**

&lt;Destination&gt;

**<RoutingID>**

&lt;Software&gt;

&lt;SoftwareProvider&gt;

&lt;SoftwareVersion&gt;

&lt;ReportingSchool&gt;

**<RoutingID>**

&lt;ReportedFinancialSummary&gt;

&lt;FinancialAwardType&gt;

&lt;TotalCount&gt;

&lt;TotalReportedAward&gt;

&lt;TotalReportedDisbursement&gt;

&lt;AttendedSchool&gt;

**<RoutingID>**

&lt;Student&gt;

&lt;Index&gt;

&lt;SSN&gt;

&lt;BirthDate&gt;

&lt;LastName&gt;

&lt;TEACH&gt;

&lt;FinancialAwardYear&gt;

<FinancialAwardNumber>

<FinancialAwardID>

<FPSTransactionNumber>

<FinancialAwardAmount>

<Disbursement>

<Disbursement Number="">

<DisbursementAmount>

<DisbursementDate>

<DisbursementReleaseIndicator>

<DisbursementSequenceNumber>

<EnrollmentSchoolCode>

<PaymentPeriodStartDate> *(Required for award years 2022-23 and forward. For award years 2021-22 and prior only if there was a period of ineligibility at the school)*

<PaymentPeriodEndDate> *(Required for award years 2022-23 and forward)*

<EnrollmentStatus>

<CIP Number="">

<ProgramCIPCode>

<PublishedPgmLengthYears>

<SpecialPrograms>

<ProgramCredentialLevel>

</CIP>

<ProgramCIPCodeYear>

## ROUTING ID

The Routing ID is an identifier assigned to Schools and Third-Party Servicers that is common across the Pell Grant, TEACH Grant and Direct Loan programs.

### BUSINESS RULES

1. The Routing ID is nested in the Entity complex elements (for example, School, COD, Reporting School, Attended School) on the Common Record and serves as a routing number for COD.
2. The Routing ID is a randomly generated eight-character, numeric key. The values in the key do not signify any information about the numbered entity except its identity.
3. Routing IDs are assigned to all post-secondary Schools, Third-Party Servicers, the COD System, and work in conjunction with the Pell Institution Number and Direct Loan (E/G) School code.
4. The Routing ID can be viewed on the [COD Website](#) by accessing the School Summary page. On the [COD Website](#), the Routing ID is titled the COD ID.

## ENTITY ID

A valid Routing ID is required in the Source, Destination, Reporting School, and Attended School complex elements.

### BUSINESS RULES

1. A valid Routing ID must be reported in the **<RoutingID>** tag nested within the following Entity complex elements
  - a. Source, <Source>
  - b. Destination, <Destination>
  - c. Reporting School, <ReportingSchool>
  - d. Attended School, <AttendedSchool>
  - e. A valid Routing ID is the Routing ID for the school or Third-Party Servicer.
2. The Source Routing ID is the physical sender of the document.

- a. The Source Routing ID must be the same Routing ID listed in the Document ID.
  - b. The Source Routing ID can be a school or Third-Party Servicer.
  - c. Since the Source Entity sends the Common Record document to COD, the TG Destination Number that the Source Entity reported in the SAIG Transmission Header and Trailer is more than likely for the same entity.
3. The Destination Routing ID is the destination or recipient of the document.
- a. If a School sends the document to the COD System, the Destination Routing ID is "00000001" for COD.
  - b. If the document is sent from the COD System back to the Source, the Destination Routing ID is equal to the Source Routing ID on the original transmission.
  - c. The response file is sent to the TG Number reported in the Transmission Header and Trailer. System generated response file is sent by COD to the TG Number for the school who has reporting relation with the attended school for the award being responded.

**Reporting, Attending Relationships:**

Reporting and Attended relationships are existing concepts in the Direct Loan program since the implementation of the COD System. Schools new to the Direct Loan Program are encouraged to call COD School Relations to verify that the Reporting/Attended relationships are accurately set in COD prior to transmitting any records. Additionally, schools that report for multiple Attended Schools are encouraged to contact COD School Relations to verify these relationships. If COD is unaware of your school's Attended/Reporting relationships, your records will reject.

4. The Reporting School Routing ID is the school that sends and receives data for the campuses or students it serves
- a. The Reporting School Routing ID must be a school and cannot be a Third-Party Servicer.
  - b. The Reporting School Routing ID does not have to be equal to the Source Routing ID but must have a relationship with the Source Entity and the TG Destination Number.
5. The Attended School Routing ID is the school or campus where the student attends class if that location has its own Pell Grant or Direct Loan code.
- a. Attended School Routing ID must be equal to the Reporting School Routing ID, OR
  - b. Attended School Routing ID must have an established relationship to the Reporting School Routing ID.
  - c. If the school or campus where the student attends class is not separately eligible, the Reporting School Routing ID must be reported in the Attended School Routing ID tag.
6. Multiple Reporting School Routing IDs and Attended School Routing IDs can be submitted in the same Common Record.



**Funding Relationships:**

The Reporting and Attending relationships reported in the Common Record do not affect the funding process. Pell Grant funding relationships are controlled separately from the reporting and attending relationships. For Direct Loans and TEACH Grant, the originating and attending campus is also the funded campus.

7. The COD System checks the Source Routing ID against the COD database and rejects the document if the Routing ID cannot be found or is invalid.
8. When the Source Routing ID cannot be found, the COD System generates a Response with error code 004.
9. When the Source Routing ID is invalid, the COD System generates a Response with error code 001.

Currently, if a school has separate TG numbers for Pell and Direct Loan and wishes to report both Pell and Direct Loan in one Common Record, the school must contact SAIG to complete paperwork to have one TG Number (schools may select which number they want to use) that reports both Pell and Direct Loan. This does NOT mean that every Common Record must have both Pell and Direct Loan information. It simply means the school would like the option of sending both Pell and Direct Loan in the same Common Record document. The school can also continue processing Pell and Direct Loan information by sending separate Common Record documents for each program using separate TG numbers.

**Example 1**

In this first example, a Common Record is submitted for Pell and Direct Loan programs for multiple schools using one TG Number for the SAIG Transmission Batch Header. The Reporting entity is sending the Common Record and is reporting awards for two other schools that are both separately eligible.

**School A**

- Reports for two additional locations – School B and School C. Therefore, this Routing ID is nested in the Reporting School complex element.
- Sends the Common Record to COD. Therefore, School A Routing ID is nested in the Source Entity complex element and the Document ID.
- TG # = 99991. This TG # is used in the SAIG Transmission Batch Header and Trailer.
- Routing ID = 11111111

**School B**

- Has an Attended relationship with School A. This Routing ID is nested in the Attended School complex element tag.
- TG # is not applicable because School A sends the Common Record.
- Routing ID = 22222222

School C

- Has an Attended relationship with School A. This Routing ID is nested in the Attended School complex element tag.
- TG # is not applicable because School A sends the Common Record.
- Routing ID = 33333333

## SAIG Transmission Header Record

### SAIG Transmission Batch Header Record (Header Destination # - TG #99991)

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c"><TransmissionData>
```

```
<DocumentID>2025-08-29T09:09:09.001111111</DocumentID>
```

```
<CreatedDateTime>2025-08-29T09:09:09.00</CreatedDateTime>
```

```
<Source>
```

```
<School>
```

```
<RoutingID>11111111</RoutingID>
```

```
</School>
```

```
</Source>
```

```
<Destination>
```

```
<COD>
```

```
<RoutingID>00000001</RoutingID>
```

```
</COD>
```

```
</Destination>
```

```
<Software>
```

```
<SoftwareProvider>mite</SoftwareProvider>
```

```
<SoftwareVersion>2.0</SoftwareVersion>
```

```
</Software>
```

```
</TransmissionData>

<ReportingSchool>

<RoutingID>11111111</RoutingID>

<AttendedSchool>

<RoutingID>22222222</RoutingID>

<Student>

<Index>

<SSN>123456789</SSN>

<BirthDate>1987-01-01</BirthDate>

<LastName>SMITH</LastName>

</Index>

</Student>

<Student>

<Index>

<SSN>987654321</SSN>

<BirthDate>1984-02-20</BirthDate>

<LastName>JONES</LastName>

</Index>

</Student>

</AttendedSchool>

<AttendedSchool>

<RoutingID>33333333</RoutingID>
```

```
<Student>
<Index>
<SSN>456789123</SSN>
<BirthDate>1987-07-15</BirthDate>
<LastName>CLARK</LastName>
</Index>
</Student>
<Student>
<Index>
<SSN>321654987</SSN>
<BirthDate>1985-05-25</BirthDate>
<LastName>JONES</LastName>
</Index>
</Student>
</AttendedSchool>
</ReportingSchool>
</CommonRecord>
```

**SAIG Transmission Batch Trailer Record (Trailer Destination # - TG #99991)**

**SAIG Transmission Trailer Record**

## Example 2

A Common Record is submitted for Pell and Direct Loan programs for multiple schools using one TG Number for the SAIG Transmission Batch Header. A Third-Party Servicer is sending the records for multiple schools.

## Third-Party Servicer

- Sends the Common Record to COD for Schools D and E. Therefore, the Third-Party Servicer Routing ID is nested in the Source complex element and the Document ID.
- TG # = 88888. This TG # is used in the SAIG Transmission Batch Header and Trailer.
- Routing ID = 44444444

## School D

- Uses a Third-Party Servicer to send records to COD; however it does its own reporting for students that attend its campus. School D Routing ID is nested in the Reporting School complex element and Attended School complex element.
- The TG # is not applicable because the Third-Party Servicer sends the Common Record.
- Routing ID = 55555555

## School E

- Uses a Third-Party Servicer to send records to COD; however, does its own reporting for students that attend its campus. School E Routing ID is nested in the Reporting School complex element and Attended School complex element.
- TG # is not applicable because the Third-Party Servicer sends the Common Record.
- Routing ID = 66666666

**SAIG Transmission Header Record****SAIG Transmission Batch Header Record (Header Destination # - TG #88888)**

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c"><TransmissionData>
```

```
<DocumentID>2025-08-29T09:09:09.0044444444</DocumentID>
```

```
<CreatedDateTime>2025-08-29T09:09:09.00</CreatedDateTime>
```

```
<Source>
```

```
<ThirdPartyServicer>
```

```
<RoutingID>44444444</RoutingID>
```

```
</ThirdPartyServicer>
```

```
</Source>
```

```
<Destination>
```

```
<COD>
```

```
<RoutingID>00000001</RoutingID>
```

```
</COD>
```

```
</Destination>
```

```
<Software>
```

```
<SoftwareProvider>mite</SoftwareProvider>
```

```
<SoftwareVersion>2.0</SoftwareVersion>
```

```
</Software></TransmissionData>
```

```
<ReportingSchool>
```

```
<RoutingID>55555555</RoutingID>

<AttendedSchool>

<RoutingID>55555555</RoutingID>

<Student>

<Index>

<SSN>123456789</SSN>

<BirthDate>1987-01-01</BirthDate>

<LastName>SMITH</LastName>

</Index>

</Student>

<Student>

<Index>

<SSN>987654321</SSN>

<BirthDate>1984-02-20</BirthDate>

<LastName>JONES</LastName>

</Index>

</Student>

</AttendedSchool>

</ReportingSchool>

<ReportingSchool>

<RoutingID>66666666</RoutingID>

<ReportedFinancialSummary>
```



```
</ReportedFinancialSummary>  
  
<AttendedSchool>  
  
<RoutingID>66666666</RoutingID>  
  
<Student>  
  
<Index>  
  
<SSN>456789123</SSN>  
  
<BirthDate>1987-07-15</BirthDate>  
  
<LastName>CLARK</LastName>  
  
</Index>  
  
</Student>  
  
<Student>  
  
<Index>  
  
<SSN>321654987</SSN>  
  
<BirthDate>1985-05-25</BirthDate>  
  
<LastName>JONES</LastName>  
  
</Index>  
  
</Student>  
  
</AttendedSchool>  
  
</ReportingSchool>  
  
</CommonRecord>
```

**SAIG Transmission Batch Trailer Record (Trailer Destination # - TG #88888)**

**SAIG Transmission Trailer Record**

## Example 3

A Common Record is submitted for the Pell and Direct Loan programs for multiple schools. The Reporting entity is sending the Common Record and is reporting awards for one other school in which ONE of its locations does not have its own Pell or Direct Loan ID.

## School F

- Reports for one additional location – School G. Therefore, this Routing ID is nested in the Reporting School complex element.
- Sends the Common Record to COD. Therefore, this Routing ID is used in the Source complex element and the Document ID.
- TG # = 33331. This TG # is used in the SAIG Transmission Batch Header and Trailer.
- Routing ID = 77777777

## School G

- School G is an additional location of School F; however, this location does not have its own unique Pell grant or Direct Loan ID. Therefore, its Routing ID is not used in the Entity ID element.
- TG # is not applicable because School F sends the Common Record.
- Routing ID = 88888888

**SAIG Transmission Header Record****SAIG Transmission Batch Header Record (Header Destination # - TG #33331)**

```
<?xml version="1.0" encoding="UTF-8"?>
```

```
<CommonRecord xmlns="http://www.ed.gov/FSA/COD/2024/v5.0c" xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:cod="http://www.ed.gov/FSA/COD/2024/v5.0c">
```

```
<TransmissionData>
```

```
<DocumentID>2025-08-29T09:09:09.0077777777</DocumentID>
```

```
<CreatedDateTime>2025-08-29T09:09:09.00</CreatedDateTime>
```

```
<Source>
```

```
<School>  
<RoutingID>77777777</RoutingID>  
</School>  
</Source>  
<Destination>  
<COD>  
<RoutingID>00000001</RoutingID>  
</COD>  
</Destination>  
<Software>  
<SoftwareProvider>mite</SoftwareProvider>  
<SoftwareVersion>2.0</SoftwareVersion>  
</Software>  
</TransmissionData>  
<ReportingSchool>  
<RoutingID>77777777</RoutingID>  
<AttendedSchool>  
<RoutingID>77777777</RoutingID>  
<Student>  
<Index>  
<SSN>123456789</SSN>  
<BirthDate>1987-01-01</BirthDate>
```

```
<LastName>SMITH</LastName>

</Index>

</Student>

<Student>

<Index>

<SSN>987654321</SSN>

<BirthDate>1984-02-20</BirthDate>

<LastName>JONES</LastName>

</Index>

</Student>

</AttendedSchool>

</ReportingSchool>

</CommonRecord>
```

**SAIG Transmission Batch Trailer Record (Trailer Destination # - TG #33331)**

**SAIG Transmission Trailer Record**

## TOTAL COUNT IN THE REPORTED FINANCIAL SUMMARY COMPLEX ELEMENT

The COD System verifies that the Total Number of Students Tags by Award Type and Award Year, `<TotalCount>`, reported in the Reported Financial Summary complex element equals the total number of student tags by award type and award year in the document.

### BUSINESS RULES

1. The COD System determines the actual total number of student tags by award type and award year in the Document by counting the number of Student Identifiers (SSN, Date of Birth and Last Name) for each award type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), award year, and Reporting School Routing ID in the document.

#### Student Identifier:

For more information please refer to the *Student Identifier* topic.

2. The COD System sends Warning Edit 008 if the reported `<TotalCount>` and the actual number of student tags by award type and award year are not identical. The warning does not prevent the document from being processed by the COD System.
3. The Total Number of Students reported may be a duplicated count. In the event that identical Student Identifiers are reported multiple times within a document for multiple award types or award years, the COD System counts them multiple times.
4. The Total Number of Students is reported by award year, by Award Type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), and by Reporting School Routing ID.

#### Example 1

In the following example, a Common Record is submitted for a student (SSN=123456789, BirthDate="1974-01-01", LastName="SMITH") containing one DL Subsidized and one Pell award. Since the `<TotalCount>` is not an unduplicated count of student tags, the student tag is counted twice in the Reported Financial Summary block, once for each award type and award year

```
<ReportingSchool>
```

```
<RoutingID>00123400</RoutingID>
```

```
<ReportedFinancialSummary>
```

```
<FinancialAwardType>DLSubsidized</FinancialAwardType>
```

```
<FinancialAwardYear>2025</FinancialAwardYear>
```

```
<TotalCount>1</TotalCount>
```

```
<TotalReportedAmount>2000</TotalReportedAmount>  
<TotalReportedDisbursement>1970</TotalReportedDisbursement>  
</ReportedFinancialSummary>  
<ReportedFinancialSummary>  
<FinancialAwardType>Pell</FinancialAwardType>  
<FinancialAwardYear>2025</FinancialAwardYear>  
<TotalCount>1</TotalCount>  
<TotalReportedAward>3700</TotalReportedAward>  
<TotalReportedDisbursement>3700</TotalReportedDisbursement>  
</ReportedFinancialSummary>
```

## TOTAL AWARD AMOUNT REPORTED IN THE REPORTED FINANCIAL SUMMARY COMPLEX ELEMENT

The COD System verifies that the Total Award Amount reported in the Reported Financial Summary complex element equals the actual total of all Award Amounts contained in the document.

### BUSINESS RULES

1. The COD System compares the Total Award Amount Reported, `<TotalReportedAward>`, against the actual total of all Award Amounts contained in the document.
2. The COD System determines the actual total of all Award Amounts by adding the values of all the Award Amount tags in the document.
3. The COD System sends a warning with error code 102 if the Total Award Amount Reported and the actual total of all Award Amounts are not equal. The warning does not prevent the document from being processed by the COD System.
4. The Total Award Amount must be reported by award year, by Award Type (Pell, DL Subsidized, DL Unsubsidized, and DL PLUS), and by Reporting School Routing ID.

## Example

```
<ReportingSchool>  
<RoutingID>00123400</RoutingID>  
<ReportedFinancialSummary>  
  <FinancialAwardType>DLSubsidized</FinancialAwardType>  
  <FinancialAwardYear>2025</FinancialAwardYear>  
  <TotalCount>1</TotalCount>  
  <TotalReportedAmount>2000</TotalReportedAmount>  
  <TotalReportedDisbursement>1970</TotalReportedDisbursement>  
</ReportedFinancialSummary>  
<ReportedFinancialSummary>  
  <FinancialAwardType>Pell</FinancialAwardType>  
  <FinancialAwardYear>2025</FinancialAwardYear>  
  <TotalCount>1</TotalCount>  
  <TotalReportedAward>3700</TotalReportedAward>  
  <TotalReportedDisbursement>3700</TotalReportedDisbursement>  
</ReportedFinancialSummary>
```

## TOTAL DISBURSEMENT AMOUNT REPORTED IN THE REPORTED FINANCIAL SUMMARY COMPLEX ELEMENT

The COD System verifies that the Total Disbursement Amount Reported in the Reported Financial Summary complex element equals the actual total of all Disbursement Amounts contained in the document.

### BUSINESS RULES

1. The COD System compares the Total Disbursement Amount Reported, <TotalReportedDisbursement> against the actual total of all Disbursement Amounts contained in the document.
2. The COD System determines the actual total of all Disbursement Amounts by adding the values of the Disbursement Amount (gross) fields, regardless of whether the Disbursement Release Indicator is true or false, in the document.
3. The COD System sends a warning with error code 090 if the Total Disbursement Amount Reported and the actual total of all Disbursement Amounts are not equal. The warning does not prevent the document from being processed by the COD System.
4. The Total Disbursement Amount Reported must be reported by award year, by Award Type (Pell, TEACH Grant, DL Subsidized, DL Unsubsidized, and DL PLUS), and by Reporting School Routing ID.

#### Example

```
<ReportingSchool>  
  
<RoutingID>00123400</RoutingID>  
  
<ReportedFinancialSummary>  
  
<FinancialAwardType>DLSubsidized</FinancialAwardType>  
  
<FinancialAwardYear>2025</FinancialAwardYear>  
  
<TotalCount>1</TotalCount>  
  
<TotalReportedAmount>2000</TotalReportedAmount>  
  
<TotalReportedDisbursement>1970</TotalReportedDisbursement>  
  
</ReportedFinancialSummary>  
  
<ReportedFinancialSummary>  
  
<FinancialAwardType>Pell</FinancialAwardType>
```



```
<FinancialAwardYear>2025</FinancialAwardYear>  
  
<TotalCount>1</TotalCount>  
  
<TotalReportedAward>3700</TotalReportedAward>  
  
<TotalReportedDisbursement>3700</TotalReportedDisbursement>  
  
</ReportedFinancialSummary>
```

## PERSON IDENTIFIER

The COD Person Identifier is composed of the student's current Social Security Number, current Date of Birth, and current Last Name.

### Current SSN, DOB, Last Name:

Current is defined as the value stored on COD as of the date of the transmission.

The person's identifier is submitted in the Student Identifier tag or the Borrower Identifier tag based upon the person's role in relationship to the incoming award. The Student Identifier is a required data element for all award types, must be included in all submissions of the Common Record and is matched against FPS data in most cases (see Student Identifier and Data Elements Matched against the FPS). The Borrower Identifier is a required data element only when submitting PLUS loans for graduate/professional students and parents of dependent undergraduate students and isn't matched against FPS data.

## BUSINESS RULES

1. The Student and Borrower Identifiers are located in the Person complex element of the Common Record and are reported by the school.
2. A person's identifier consists of the `<Student>` or `<Borrower>` tag and three attributes: the person's current Social Security Number, current Date of Birth, and current Last Name.
  - a. The Social Security Number (SSN) portion of the Person Identifier must contain nine digits.
  - b. The SSN portion of the Person Identifier must be within the range of 000-01-0001 to 999-99-9998.
  - c. The SSN portion of the Person Identifier may or may not contain hyphens after the third and fifth digits.
  - d. The Date of Birth (DOB) portion of the Person Identifier must be in the CCYY-MM-DD format.
  - e. The DOB portion of the Person Identifier must be greater than 1925-01-01 and less than 2016-12-31.

- f. The Last Name portion of the Person Identifier may consist of upper-case letters A-Z, spaces, period, apostrophe, and dash.
  - g. The Last Name portion of the Person Identifier may be blank.
- 3. All three Person Identifier attributes are required for processing by the COD System.
- 4. The COD System stores one set of Person Identifiers for each person. Person identifiers are not stored by award. COD uses the <Student> or <Borrower> tag to determine the person's relationship to the incoming award (student or PLUS borrower).
- 5. Changes to a person's identifier data elements must be submitted in the Social Security Number, Date of Birth, and/or Last Name simple element tags and not in <Student> or <Borrower> tag. Changes in the Person Identifier tag will not be recognized by the COD System.
- 6. On the first submission for a person for a new award year, it is recommended that the school submit the Person Identifier data elements in both the <Person> Complex Element and the <SSN>, <Last Name>, and <Date of Birth> simple elements. In some cases, unbeknownst to the school submitting the record, the person already exists on COD with different Person Identifier data (usually a different Last Name) due to activity at another school for a previous award year.
- 7. By submitting the <SSN>, <Last Name>, and <Date of Birth> simple elements, the school will trigger COD to attempt to change the person's identifier data. If a change is made, all schools with records for that person will receive an SSN/Name/Date of Birth Change Report.
- 8. In cases where the simple elements are not submitted, the school's award record may still accept (assuming it passes the FPS match, if appropriate, and all other applicable edits), but the Person Identifier data stored on COD will not be updated since COD does not recognize Person Identifier changes submitted in the Person Identifier tags. The previous Person Identifier data will appear in all COD system generated transactions and reports until the simple elements are submitted.
- 9. Alternatively, schools may use the [COD Website](#) to search person data by SSN to confirm that the Person Identifier data on COD matches the Person Identifier data on their systems and determine if a Person Identifier change is necessary. Schools may also submit Person Identifier changes through the [COD Website](#) if their software does not permit the submission of the <SSN>, <Last Name>, and <Date of Birth> simple elements.
- 10. Regardless of whether the changed simple element is accepted or rejected by the COD System, the person's old identifier is returned in the Response.
- 11. If the changed simple element is accepted, the school must submit the new Person Identifier combination in future transmissions.
- 12. If the changed simple element is rejected, the person's old identifier combination must be used in future transmissions.
- 13. The COD System stores the previously submitted Social Security Number for query purposes.
- 14. If the <SSN>, <Last Name>, and <Date of Birth> simple element is submitted with the same value that is listed in the attribute on the COD system, no update takes place.

## PLUS RULES APPLIED TO ALL AWARD TYPES

Since PLUS borrowers may also be students, the following rules apply if the person is a PLUS borrower and may be applied to any award type:

### Business Rules

1. For Direct PLUS Loan Borrowers (either parent or graduate student), their SSN is used to perform the PLUS credit check. Attempts to change the SSN for a PLUS Borrower (for any award type) will be rejected with Reject Edit 121 if the following conditions exist:
  - a. PLUS award is greater than zero, and
  - b. The sum of all actual disbursements for the PLUS loan doesn't equal the PLUS award amount (PLUS award isn't fully disbursed).
2. Schools can change the SSN for a PLUS Borrower if the PLUS award amount has been fully disbursed for at least 24 hours or the PLUS loan is inactive. Therefore, to change a PLUS Borrower's SSN, the school must do one of the following:
  - a. If no actual disbursements have been reported, reduce the loan to zero and originate a new loan with the correct SSN.
  - b. If at least one actual disbursement has been reported, reduce the loan to the disbursed amount and originate a new loan for the balance of eligibility with the corrected SSN.
3. If a Date of Birth Change for a student whose parent has a PLUS loan (Parent PLUS) results in the parent and student Dates of Birth being the same, COD will reject the change with Edit 149. This applies to all award types (Pell, TEACH Grant, Sub, Unsub, PLUS).
4. If an SSN Change for a student whose parent has a PLUS loan (Parent PLUS) results in the parent and student SSNs being the same, COD will reject the change with Edit 152 whether the change is submitted on an initial submission of a loan or an award change record. This applies to all award types (Pell, TEACH Grant, Sub, Unsub, PLUS).
5. If an SSN Change for a parent who has a PLUS loan (Parent PLUS) results in the parent and student SSNs being the same, COD will reject the change with Edit 153 whether the change is submitted on an initial submission of a loan or an award change record. This applies to all award types (Pell, TEACH Grant, Sub, Unsub, PLUS).

PLUS RULES APPLIED TO ONLY PLUS AWARDS

The following rules apply only to PLUS Loan submissions for both initial submissions and changes:

Business Rules

- 1. The COD System will allow Last Name or Date of Birth Person Identifier changes to be submitted at either the student or borrower level.
- 2. If the same SSN is submitted within the student and borrower identifier tags (Grad PLUS), the following elements within the student and borrower tags must also be the same.
  - a. Last Name
  - b. Date of Birth

If either of these elements within the <student> and <borrower> do not match, COD will return Reject Edit 147 in the response.

- 3. If the same SSN is submitted within the student and borrower tags (Grad PLUS) and the student and borrower first name doesn't match, COD will return Warning Edit 148.
- 4. If the <Student> or <Borrower> Person Identifier tags match (Grad PLUS initial submission) AND the <LastName> and/or <BirthDate> tags are submitted on both the student and borrower levels, OR the COD system shows that the student and borrower are the same person (Grad PLUS changes) and the Last Name and/or Date of Birth tags are submitted on both the student and borrower levels, then the <LastName> and/or <BirthDate> tags must be the same or the COD system will reject the record with Reject Edit 147.
- 5. If the <Student> or <Borrower> Person Identifier tags don't match (Parent PLUS initial submission) and the <BirthDate> tags are submitted on both the student and borrower levels, OR the COD system shows that the student and borrower are different people (Parent PLUS changes) and the <BirthDate> tags are submitted on both the student and borrower levels, then the <BirthDate> tags must be different or the COD system will reject the record with Reject Edit 149.
- 6. A Direct PLUS Loan borrower with a Declined Original Credit Decision must obtain an approved credit appeal due to extenuating circumstances or an approved endorser, and complete PLUS Credit Counseling before the school can disburse. If an actual disbursement is submitted without the completion of the above, the record will reject with edit 217.

Example:

A Parent PLUS award is created for Student A and Borrower B with the following date of birth information:

Person	Date of Birth
Student A	1981-01-01
Borrower B	1955-02-02

Table 6

Borrower B is also a Student on a Pell award. If the Pell award is submitted with a <BirthDate> tag changing for Borrower B date of birth to 1981- 01-01, Borrower B's date of birth will match Student A's date of birth and Reject Edit 149 will be triggered.

7. When changing the SSN for a Grad PLUS borrower using the Grad PLUS loan, the SSN change must be submitted at the borrower level. If it is submitted at the student level only without a corresponding change at the borrower level, the change will be rejected with the following Reject Edits:
  - a. Reject Edit 016 for Award Years 2007-08 and prior.
  - b. Reject Edit 151 for Award Years 2008-09 and forward.

If credit is declined or pending, then the change must be submitted in both the Borrower and the Student.

8. For Award Year 2005-06 and forward, COD will accept a PLUS award with the same student and borrower information if the student's Grade Level is 6 or higher. If the student and borrower identifiers are the same and the student's Grade Level is less than 6, COD will reject the record using the following error codes:
  - a. Reject Edit 16 for Award Years 2007-08 and prior.
  - b. Reject Edit 150 for Award Years 2008-09 and forward.
9. For Award Year 2012-13 and forward, Reject edit 181 and Reject edit 182 are no longer triggered on PLUS awards origination and change records. The COD System accepts and stores changes to all student and borrower level person identifier fields (SSN, DOB, Last Name), submitted for PLUS Awards with declined or pending credit decisions.
10. For Award Year 2012-13 and forward, Edit 121 will allow borrower SSN change on PLUS awards that have been zeroed out or fully funded.
11. Beginning in March 2012, schools are no longer required to send in all tags when performing changes on Direct PLUS Loans with denied credit. Student and award level maintenance may be done using the minimum required tags.
12. Beginning in March 2015, if the Direct PLUS Loan borrower has a Declined Original Credit Decision on file, they will be required to complete PLUS Credit Counseling even if an endorser is obtained. If an actual disbursement is submitted without the completion of PLUS Credit Counseling or an endorser, the record will reject with edit 217.

## BUSINESS RULES

1. The Student Identifier is located in the Person complex element of the Common Record and is reported by the school.
2. A Student Identifier is a required data element for all submissions of a Common Record.
3. A Student Identifier consists of the <Student> tag and three attributes: the student's current Social Security Number, current Date of Birth, and current Last Name.

- a. The Social Security Number portion of the Student Identifier must contain nine digits.
  - b. The Social Security Number portion of the Student Identifier must be within the range of 000-01-0001 to 999-99-9998.
  - c. The Date of Birth portion of the Student Identifier must be in the CCYY-MM-DD format.
  - d. The Date of Birth portion of the Student Identifier must be greater than 1925-01-01 and less than 2016-12-31.
  - e. The Last Name portion of the Student Identifier may consist of upper-case letters A-Z, spaces, period, apostrophe, and dash.
  - f. The Last Name portion of the Student Identifier may be blank.
4. All three attributes of the Student Identifier (current Social Security Number, current Date of Birth, and current Last Name) are required for processing by the COD System.

**Establishing Borrowers:**

For Direct PLUS Loan Awards the student is established and the person (either a parent borrower or the same graduate student borrower) must be established. Parent borrowers are not matched against data from the FPS. Student information is matched against data from the FPS.

5. The Student Identifier submitted by a school to establish the student on COD is matched to data from the FPS.
  - a. For Pell and TEACH Grants, the SSN, Date of Birth, and first two characters of the Last Name are matched with the FPS data.
  - b. For Subsidized, Unsubsidized Direct Loans and PLUS Loans, the SSN and Date of Birth of the student are matched with the FPS data.
6. If a match is found on FPS, COD accepts the student and establishes the student identifier on COD. The student identifier must be submitted in subsequent transactions for that student.
7. If a match is not found on FPS, COD rejects the student and returns a Reject Edit of 011.

**Changing Student Demographic Information:**

Please refer to the Minimal Data Elements Required for Processing topic for more information on changing other student demographic information.

**Example**

<Student>

<Index>

```
<SSN>123456789</SSN>
```

```
<BirthDate>1974-01-01</BirthDate>
```

```
<LastName>SMITH</LastName>
```

```
</Index>
```

```
</Student>
```

### Changing Student Demographic Information:

Please refer to the *Changing Student Identifier Information* section for more information on making corrections or updates to the student identifier.

## CHANGING STUDENT IDENTIFIER INFORMATION

### ISIR:

Please refer to the Institutional Student Information Record entry in Volume 6, Section 1 – Glossary of Terms for more information.

To change Student Identifier information, the school or student must first submit a correction to the ISIR, which will result in another transaction on the FPS. After the correction has been submitted to and accepted by the FPS, the school must send a Common Record to the COD System reporting the student tag with the previously reported Student Identifier information currently stored on COD and the changed data in the corresponding simple element tag (Social Security Number, Date of Birth, or Last Name).

## BUSINESS RULES

1. COD stores one Student Identifier for a student; COD does not store separate Student Identifiers for each award.
2. Changes to the Student Identifier data elements must be submitted in the Social Security Number, Date of Birth, and/or Last Name simple element tags and NOT in the Student tag. Changes submitted in the Student tag will not be recognized by the COD System.

On the first submission for a student for a new award year, it is recommended that the school submit the student identifier data elements in both the Student Complex Element and the SSN, Last Name, and Date of Birth simple elements. In some cases, unbeknownst to the school submitting the record, students have already existed on COD with different Person Identifier data (usually a different Last Name) due to activity at another school for a previous award year.

By submitting the SSN, Last Name, and Date of Birth simple elements, the school will trigger COD to attempt to change the student's identifier data for the student. If a change is made, all schools with records for that student will receive an SSN/Name/Date of Birth Change Report.

In these cases, if the simple elements are not submitted, the school's award record may still accept (assuming it passes the FPS match and all other applicable edits), but the Person Identifier data stored on COD will not be updated since COD does not recognize Person Identifier changes submitted in the Student tag. The previous Person Identifier data will appear in all COD System generated transactions and reports until the simple elements are submitted.

Alternatively, schools may use the COD Website to search person data by SSN to confirm that the Person Identifier data on COD matches the Person Identifier data on their systems and determine if a Person Identifier change is necessary. Schools may also submit Person Identifier changes through the COD Website if their software does not permit the submission of the SSN, Last Name, and Date of Birth simple elements.

3. Upon receipt of a changed Social Security Number, Date of Birth, or Last Name simple element from the school, the COD System attempts to match the changed simple element tag against the FPS.
  - a. If an identical change is found on the FPS, the COD System accepts the changed simple element, updates the Student Identifier, and sends a Response to the school.

**Note:**

Due to the order in which COD matches student identifier data elements with the FPS, it is possible that COD will return error code 012 on SSN even when a school submitted a change on Date of Birth or Last Name, if the Date of Birth and/or Name has not been updated on the FPS. Please refer to the Student Identifier and Data Elements Matched against the FPS topic for more information.

- b. If an identical change is not found on the FPS, the COD System rejects the changed simple element and sends a Response to the school with Reject Edit 012
4. Regardless of whether the changed simple element is accepted or rejected by the COD System, the old Student Identifier is returned in the Response.
5. If the changed simple element is accepted, the school must submit the new Student Identifier combination in future transmissions.
6. If the changed simple element is rejected, the old Student Identifier combination must be used in future transmissions.
7. The COD System stores the Social Security Number previously submitted to the COD System for query purposes on the COD Website.
8. If the Social Security Number, Date of Birth, or Last Name simple element is submitted with the same value that is listed in the attribute on the COD System, no update takes place. If the award year submitted on the change record is lower than the highest award year listed for the student on the COD System, or if the FPS transaction number on the change record is either lower than the highest FPS transaction number on the COD System for that award year and student or equal to the highest FPS transaction number and the Person Identifier data does not match with FPS, no update takes place and a warning is sent to the school with error code 116.
9. If a combination of the current Social Security Number, current Date of Birth, or current Last Name simple elements are changed in the same submission, all changes must be matched on the FPS.



- a. If all changes are not matched on the FPS, the COD System rejects all changed simple elements and the old Student Identifier is returned in the Response to the school.

10. If the Student SSN matches the Borrower SSN on the incoming file and the Grad PLUS award already exists on the COD System, the following Person Identifiers must match:

- a. **For Parent PLUS:** Complete Student Last Name change and complete Borrower Last Name change

#### Matching First Names:

If the complete Student First Name does not match complete Borrower First Name, the COD System will return Warning Edit 148.

- b. **For all awards:** Complete Student Date of Birth change and complete Borrower Date of Birth change
- c. **For all awards:** Complete Student SSN change and complete Borrower SSN

If any of the pairs of Person Identifiers mentioned above **do not** match, the COD System will return Reject Edit 147.

11. If the Student SSN differs from the Borrower SSN on the COD System and the Parent PLUS award already exists on the COD System, the following Person Identifiers must **not** match:

- a. Complete Student Date of Birth change and complete Borrower Date of Birth change
- b. Complete Student Date of Birth change and what currently exists on the COD System for the Borrower Date of Birth, AND no Borrower Date of Birth change tag is submitted
- c. Complete Borrower Date of Birth change and what currently exists on the COD System for the Student Date of Birth, AND no Student Date of Birth change tag is submitted

If any of the pairs of Person Identifiers mentioned above do match, the COD System will return Reject Edit 149.

12. Changes made to a Grad PLUS Borrower's SSN must also be made at the Student level. Attempts to change the SSN at Student level without a corresponding change at the Borrower level will result in:

- a. Reject Edit 016 for Award Years 2007-08 and prior
- b. Reject Edit 151 for Award Years 2008-09 and forward

13. If a PLUS award for Parent of a Dependent Undergraduate Student new origination or award change record is submitted with a change to the Student SSN that would result in the Student SSN equal to the Borrower SSN, and the Student's SSN does not currently equal the Borrower's SSN on the COD System, the COD System will trigger Reject Edit 152.

14. If a PLUS award for Parent of a Dependent Undergraduate Student new origination or award change record is submitted with a change to the Borrower SSN that would result in the Student SSN equal to the Borrower SSN, and the Student's SSN does not currently equal the Borrower's SSN on the COD System, the COD System will trigger Reject Edit 153.

#### Example

A student's last name changes from Oldhat to Newbry. Once the correction has been submitted to the FPS, the appropriate submission to the COD System is:

```
<Student>
```

```
  <Index>
```

```
    <SSN>123456789</SSN>
```

```
    <BirthDate>1974-01-01</BirthDate>
```

```
    <LastName>OLDHAT</LastName>
```

```
  </Index>
```

```
  <Name>
```

```
    <LastName>NEWBRY</LastName>
```

```
  </Name>
```

```
</Student>
```

The COD Response contains the old student identifier:

```
<Student>
```

```
  <Index>
```

```
    <SSN>123456789</SSN>
```

```
    <BirthDate>1974-01-01</BirthDate>
```

```
    <LastName>OLDHAT</LastName>
```

```
</Index>
```

```
</Student>
```

If the COD System accepts the change, subsequent transmissions by the school must contain:

```
<Student>
```

```
<Index>
```

```
<SSN>123456789</SSN>
```

```
<BirthDate>1974-01-01</BirthDate>
```

```
<LastName>NEWBRY</LastName>
```

```
</Index>
```

```
</Student>
```

If the COD System rejects the change, subsequent transmissions by the school must contain:

```
<Student>
```

```
<Index>
```

```
<SSN>123456789</SSN>
```

```
<BirthDate>1974-01-01</BirthDate>
```

```
<LastName>OLDHAT</LastName>
```

```
</Index>
```

```
</Student>
```

## BORROWER IDENTIFIER

The Borrower Identifier is used to submit parent or graduate student borrower data when processing a PLUS Loan. The COD Borrower Identifier is composed of the parent or graduate student borrower's current Social Security Number, current Date of Birth, and current Last Name.

### Current SSN, DOB, Last Name:

*Current* is defined as the value stored on COD as of the date of the transmission.

## BUSINESS RULES

1. The Borrower Identifier is located in the Person complex element of the Common Record and is reported by the school.
2. A Borrower Identifier is a required data element for all submissions for a PLUS Loan.
3. A Borrower Identifier consists of the Borrower tag and three attributes: the person's current Social Security Number, current Date of Birth, and current Last Name.
  - a. The Social Security Number portion of the Borrower Identifier must contain nine digits.
  - b. The Social Security Number portion of the Borrower Identifier must be within the range of 000-01-0001 to 999-99-9998.
  - c. The Date of Birth portion of the Borrower Identifier must be in the CCYY-MM-DD format.
  - d. The Date of Birth portion of the Borrower Identifier must be greater than 1925-01-01 and less than 2025-12-31.
  - e. The Last Name portion of the Borrower Identifier may consist of upper-case letters A-Z, spaces, period, apostrophe and dash.
  - f. The Last Name portion of the Borrower Identifier may be blank.
4. The Borrower Identifier submitted by a school to establish the parent or graduate student borrower on COD is not matched with data from FPS.
5. For Award Year 2005-06 and forward, COD will accept a PLUS award with the same student and borrower information if the Grade Level for the student is 6 or higher. Otherwise, the record will trigger:
  - a. Reject Edit 016 for Award Years 2007-08 and prior.
  - b. Reject Edit 150 for Award Years 2008-09 and forward.
6. The Borrower Identifier is changed using the same process as updating a Student Identifier. However, the updates to a Borrower Identifier are NOT matched to FPS data on file at COD.

7. If the Student SSN matches the Borrower SSN, the following Person Identifiers must match:

**Matching First Names:**

If the complete Student First Name does not match complete Borrower First Name, the COD System will return Warning Edit 148.

- a. Complete Student Last Name and complete Borrower Last Name
- b. Complete Student Date of Birth and complete Borrower Date of Birth
- c. Complete Student Last Name change and complete Borrower Last Name change
- d. Complete Student Date of Birth change and complete Borrower Date of Birth change
- e. Complete Student SSN change and complete Borrower SSN change

If any of the pairs of Person Identifiers mentioned above **do not** match, the COD System will return Reject Edit 147.

**Correct SSN on MPN:**

When originating a new loan with the correct SSN, a new Promissory Note may be required.

8. If the Student SSN differs from the borrower SSN, the following Person Identifiers must **not** match:
- a. Complete Student Date of Birth and complete Borrower Date of Birth
  - b. Complete Student Date of Birth change and complete Borrower Date of Birth change
  - c. Complete Student Date of Birth change and Borrower Date of Birth, AND No Borrower Date of Birth change tag is submitted
  - d. Complete Borrower Date of Birth change and Student Date of Birth, AND No Student Date of Birth change tag is submitted

If one pair of the Person Identifiers mentioned above **do** match, the COD System will return Reject Edit 149.

Example

<Borrower>

<Index>

<SSN>123456789</SSN>

```
<BirthDate>1964-01-01</BirthDate>  
  
<LastName>SMITH</LastName>  
  
</Index>  
  
</Borrower>
```

## CHANGING BORROWER IDENTIFIER INFORMATION

When changing borrower information for a Parent PLUS loan, it is important to ensure that all changes will not cause the borrower information to match the student information. When changing Borrower identifier information for a Grad PLUS loan, it is important to ensure all changes made to the borrower information are reflected in the student information changes.

### BUSINESS RULES

#### Matching First Names:

If the complete Student First Name does not match complete Borrower First Name, the COD System will return Warning Edit 148.

1. For Direct PLUS Loan Borrowers (either parent or graduate student), their SSN is used to perform the PLUS credit check. Attempts to change the SSN for a PLUS Borrower (for any award type) will reject with Reject Edit 121 if the following conditions exist:
  - a. PLUS award amount is greater than zero, AND
  - b. The sum of all actual disbursements for PLUS loans does not equal the PLUS award amount (PLUS award is not fully disbursed).
2. Schools can change the SSN for a PLUS Borrower (either parent or graduate student) if the PLUS award amount has been fully disbursed for at least 24 hours.
3. If a SSN change is required for a PLUS Borrower (either parent or graduate student), the school must do one of the following:
  - a. If no actual disbursements, reduce the loan to zero and originate a new loan with the correct SSN.
  - b. If partial disbursement, reduce the loan to the disbursed amount and originate a new loan for the balance of eligibility with the correct SSN.
4. Changes made to a Grad PLUS Borrower's SSN must also be made at the Student level. Attempts to change the SSN at Student level without a corresponding change at the Borrower level will result in:
  - a. Reject Edit 016 for Award Years 2007-08 and prior

- b. Reject Edit 151 for Award Years 2008-09 and forward
5. If the Student SSN matches the Borrower SSN on the incoming file and the Grad PLUS award already exists on the COD System, the following Person Identifiers must match:
- a. Complete Student Last Name change and complete Borrower Last Name change
  - b. Complete Student Date of Birth change and complete Borrower Date of Birth change
  - c. Complete Student SSN change and complete Borrower SSN change

If one pair of the Person Identifiers mentioned above do not match, the COD System will return Reject Edit 147.

6. If the Student SSN differs from the Borrower SSN on the COD System and the Parent PLUS award already exists on the COD System, the following Person Identifiers must **not** match:
- a. **For Parent PLUS:** Complete Student Date of Birth change and complete Borrower Date of Birth change
  - b. **For all awards:** Complete Student Date of Birth change and what currently exists on the COD System for the Borrower Date of Birth, AND no Borrower Date of Birth change tag is submitted
  - c. **For all awards:** Complete Borrower Date of Birth change and what currently exists on the COD System for the Student Date of Birth, AND no Student Date of Birth change tag is submitted

If one pair of the Person Identifiers mentioned above **do** match, the COD System will return Reject Edit 149.

## FPS TRANSACTION NUMBER

The FPS Transaction Number is a required field on the Common Record for Pell Grant, TEACH Grant, and Direct Loan (DL Subsidized, DL Unsubsidized, DL PLUS) processing.

### FPS Transaction Number & DL PLUS Loans:

Since July 2011, the COD System matches student identifier information against data pulled from the FPS. This change is applicable for the 2011- 12 Award Year and forward.

## BUSINESS RULES

1. The FPS Transaction Number is a required field on the Common Record for Pell Grant, TEACH Grant, and Direct Loan (DL Subsidized, DL Unsubsidized, and DL PLUS) Award information.

## STUDENT IDENTIFIER AND DATA ELEMENTS MATCHED AGAINST THE FPS

COD performs two student matches against FPS. The first match confirms that the Student Identifier exists on the FPS. This match does not utilize the FPS Transaction Number submitted by the school. The second match validates certain data elements for editing purposes. This match utilizes the FPS Transaction Number submitted by the school.

### Date of Death Notification:

In an effort to assist schools in identifying students who are deceased, COD uses data provided from the Social Security Administration (SSA) through the CPS to trigger a warning Edit 215.

**Note:** Warning Edit 215 will only trigger for Award Years 2012-13 through 2023-24.

## BUSINESS RULES

1. The COD System stores one Student Identifier for a student. The COD System does not store separate Student Identifiers for each award.
2. The FPS Transaction Number is stored at the Award level; the COD System stores a separate FPS Transaction Number for each award.
3. The COD System performs a match against the FPS when a Common Record contains:
  - a. A new student with an award (*please see example 1*)
  - b. A change to the Student Identifier (*please see example 2*)
  - c. A new award with a new FPS Transaction Number (*please see example 2*)
  - d. An existing award with a new FPS Transaction Number (*please see example 3*)
4. When a Common Record contains a **new student** with a Pell, or TEACH Grant award:
  - a. COD matches the SSN, Date of Birth, first two characters of the Last Name, and the FPS Transaction Number with data from FPS.
  - b. COD uses the FPS Transaction Number submitted to pull data elements from FPS for processing the award.



5. When a Common Record contains a **new student** with a Subsidized or Unsubsidized Direct Loan award:
  - a. COD matches the SSN, Date of Birth, and the FPS Transaction Number with data from FPS.
  - b. COD uses the FPS Transaction Number submitted to pull data elements from FPS for processing the award.
6. When a Common Record contains a **change to the Student Identifier**:

When a school sends a change to a Direct Loan award with a new FPS Transaction Number, COD does not go back out to FPS and pull information on that FPS Transaction Number.

- a. COD checks that **any** FPS Transaction Number greater than the FPS Transaction Number used to establish the student exists in the data from FPS. If the FPS Transaction Number on the change record is either lower than the highest FPS Transaction Number on the COD database or equal to the highest FPS Transaction Number and the Person Identifier data does not match with FPS, no update to the student identifier takes place and Warning Edit 116 is sent to the school.
  - b. For Direct Loans the match is only on the Social Security Number (SSN) and Date of Birth.
7. When a Common Record contains a new award for an existing student:
  - a. The Student Identifier tag must be the current Student Identifier on file at COD.
  - b. COD uses the FPS Transaction Number submitted to pull data elements from FPS for processing the award.
  - c. If the student identifier data elements do not match the SPECIFIC FPS Transaction Number, the record will reject with edit code 24.
8. When a Common Record contains a **new FPS Transaction Number** for an existing award:
  - a. The Student Identifier needs to be the current Student Identifier on file at COD.
  - b. COD uses the new FPS Transaction Number submitted to pull data elements from FPS for processing the award.
  - c. COD does NOT match the student identifier data elements with the FPS Transaction Number submitted in the Award complex element
9. COD matches the student identifier data elements in the following order: SSN, Date of Birth, and Last Name.

It is possible that COD will return Reject Edit 012 on SSN even when a school submitted a change on Date of Birth or Name if the Name and/or Date of Birth have not been updated on the FPS.

10. When a new award is submitted with a FPS Transaction Number already used by a previously accepted award for the same student, a new FPS match is NOT performed.

11. A later FPS Transaction Number submitted by a student or another school does NOT affect a match performed using an earlier FPS Transaction Number.

Example 1: New Student, New Award

A school submits a Pell Grant for a student (SID = 3188888881983-03-04JONES) using FPS Transaction Number 01. There is a match at COD on the FPS data

FPS ISIR Data					
FAN ID	SSN	DOB	Last Name	Pell Eligibility	SAI
123444532971	318888888	1983-03-04	JONES	Y	0

Table 7

This establishes the **student** on the COD Database with a student identifier 3188888881983-03-04JONES.

COD SID Database			
SID	318888888	1983-03-04	JONES

Table 8

Transactions			
Award	Amount	FPS Transaction	Status
Pell	\$4000.00	1	Accepted

Table 9

## Example 2: New Award, New FPS Transaction Number and Change to Student Identifier

The student gets married resulting in a Name change from Jones to Taylor. The student also becomes a graduate student and is no longer Pell eligible. These changes have already been reported to FPS resulting in a FPS Transaction Number 03.

The school submits a Direct Loan award using FPS Transaction Number 03 and the current SID of 3188888881983-03-04JONES, but also submits the name change of Taylor. The Direct Loan award is accepted as there is a match with FPS data at COD for the SSN and Date of Birth and FPS Transaction Number 03.

FPS ISIR Data					
FAN ID	SSN	DOB	Last Name	Pell Eligibility	SAI
123444532971	318888888	1983-03-04	JONES	Y	0
123444532971	318888888	1983-03-04	JONES	Y	250
123444532973	318888888	1983-03-04	TAYLOR	N	0

Table 10

The student identifier is updated to 3188888881983-03-04TAYLOR.

COD SID Database			
SID	318888888	1983-03-04	TAYLOR
SID	318888888	1983-03-04	JONES

Table 11

Transactions			
Award	Amount	FPS Transaction	Status
Pell	\$4000.00	1	Accepted
Direct Loan	\$7500.00	3	Accepted

Table 12

## Example 3: Change to FPS Transaction Number on Existing Award

Suppose the student's SAI changes. The school submits an update to the Direct Loan using FPS Transaction Number 04. The school submits using student identifier: 318888888 1983-03-04 TAYLOR.

FPS ISIR Data					
FAN ID	SSN	DOB	Last Name	Pell Eligibility	SAI
123444532971	318888888	1983-03-04	JONES	Y	0
123444532971	318888888	1983-03-04	JONES	Y	250
123444532973	318888888	1983-03-04	TAYLOR	N	0
123444532973	318888888	1983-03-04	TAYLOR	N	500

Table 13

Transactions			
Award	Amount	FPS Transaction	Status
Pell	\$4000.00	1	Accepted
Direct Loan	\$7500.00	3	Accepted
Direct Loan	\$7250.00	4	Accepted

Table 14

COD SID Database			
SID	318888888	1983-03-04	TAYLOR
SID	318888888	1983-03-04	JONES

Table 15

## PARENT IDENTIFIER MATCHED AGAINST THE FPS AND CREDIT REPORTING AGENCY

COD matches parent identifiers against the student's FPS transactions and against the identifiers returned by the Credit Reporting Agency.

### BUSINESS RULES:

1. Upon receipt of a parent Direct PLUS Loan origination or identifier change, COD matches the borrower SSN and borrower DOB against parent identifiers on a student's FPS transactions across all award years.
2. Only transactions where the parent identifiers have a Social Security Administration (SSA) SSN Match Flag of '4' (SSN, name, and date of birth match) are used.
3. If no matching transaction is found, COD matches the parent identifier data against the identifier data returned by the credit reporting agency.
4. If the data matches either a FPS transaction or the credit reporting agency data, the record is accepted.
5. If the parent identifiers don't match a FPS transaction or the credit reporting agency identifier data, the record will reject with edit 216.

## DATA ELEMENTS PULLED FROM THE FPS

The COD System pulls certain data elements from information provided by the FPS for editing purposes only.

### BUSINESS RULES

1. The COD System uses the FPS Transaction Number reported in the Award complex element to pull certain data elements from information provided by the FPS.
2. For each Pell Grant award received, the COD System always pulls the following data elements from the FPS:
  - a. Student Aid Index (SAI)
  - b. Max Pell Indicator
  - c. Minimum Pell Indicator
  - d. Pell Eligibility Flag
  - e. Iraq Afghanistan Service Grant Indicator

- f. Children of Fallen Heroes Indicator
  - g. Verification Selection
3. The COD System determines if certain data elements are transmitted in the Common Record or already exist for the student and award year on the COD database. If neither is true, the COD System will 'pull' these data elements from information provided by the FPS.
- a. For each Direct Loan, Pell Grant, or TEACH Grant award received, the following data elements are pulled from the FPS information when absent on both the Common Record submission and the COD database:
    - i. First Name
    - ii. Loan Default/Grant Overpayment for student
    - iii. Citizenship status
  - b. The COD System will pull the student address from the highest FPS transaction number for the most recent award year.
    - i. Address (If any of the fields are absent: Address, City, State [Domestic only], State/Province [International only], Postal Code, Country [International only], Email Address).

## Citizenship Status Code Processing for Pell, TEACH and Direct Sub/Unsub

### Citizenship Status:

The citizenship status cannot be pulled from the FPS for PLUS loans and, therefore, is required on the Common Record for PLUS loans.

The functionality for the Citizenship Status has been modified to standardize the logic for all programs.

With the 2009-10 Award Year and forward, the COD System accepts a value of 2 - Eligible Non-Citizen' in the Citizenship Status Code field as a valid value to receive Pell awards. And for 2010-11, this functionality was added for TEACH, and Direct Sub/Unsub programs. If a Citizenship Status Code of '1' or '2' is submitted on the Common Record, the COD System will accept and build the award. If a value other than '1' or '2' is submitted on the Common Record, COD will reject the student.

### BUSINESS RULES

- 1. If the Citizenship Status Code field is not populated on the incoming origination, the COD System will now evaluate the values from the FPS data. If the Citizenship Status Code is not populated, the COD System will evaluate the value in the 'Student SSA Citizenship Flag Results' field.
- 2. If the Student SSA Citizenship Flag Results field from FPS is 'blank' or 'A', COD will accept and build the award with a Citizenship Status of '1'. If

the Student SSA Citizenship Flag Results field on FPS is a value other than 'A' or 'blank', COD will look for a value in the 'DHS Primary Match Status' field on the FPS data.

3. If a value of 'Y' is found in the DHS Primary Match Status, the COD System will accept and build the Citizenship Status with a value of '2'. If there is any value other than 'Y' in the DHS Primary Match Status, COD will check the value in the 'Secondary DHS Match Flag' field of the FPS data.
  - a. If the Secondary DHS Match Flag has a value of 'Y', COD will accept and build the award with a Citizenship Status of '2'.
4. COD will reject a new origination record if the Citizenship Status Code is not submitted on the incoming origination, the Student SSA Citizenship Flag Results field is not 'A' or 'blank', the DHS Primary Match Status is a value other than 'Y', and the Secondary DHS Match Flag is a value other than 'Y'. If a value is pulled from FPS, this will be stored on the COD System but will not be returned on the Common Record response.

#### Example

The COD Response complex element contains the <CitizenshipStatusCode> field within the Citizenship complex submitted in the Common Record:

```
<Citizenship>  
  <CitizenshipStatusCode>1</CitizenshipStatusCode>  
</Citizenship>
```

## Note Message Field

A School Note Message field, <SchoolNoteMessage>, is included on the Common Record. It is nested within the <Note> complex element, which is nested within the Person, Award, and Disbursement complex elements. This field can be used by the school for any purpose and is ignored during COD processing.

## BUSINESS RULES

1. Regardless of whether the school opts for a Full or Standard Response, the School Note Message field is returned in the same Person, Award, and Disbursement complex elements as was submitted by the school.
2. The School Note Message field can be viewed and modified on the [COD Website](#) for award and disbursement records.
3. No field level compression is allowed in this field.

## Example

The school uses a unique Person Identifier for the student in their system. The school uses the `<SchoolNoteMessage>` field in the Student Award complex element to record this unique Person Identifier.

```
<Student>

  <Index>

    <SSN>123456789</SSN>

    <BirthDate>1973-01-01</BirthDate>

    <LastName>SMITH</LastName>

  </Index>

  <Note>

    <SchoolNoteMessage>888888</SchoolNoteMessage>

  </Note>

</Student>
```

The COD Response complex element contains the `<SchoolNoteMessage>` field with the content submitted in the Common Record:

```
<Student>

  <Index>

    <SSN>123456789</SSN>

    <BirthDate>1973-01-01</BirthDate>

    <LastName>SMITH</LastName>

  </Index>

  <Note>
```



```
<SchoolNoteMessage>888888</SchoolNoteMessage>  
  
</Note>  
  
</Student>
```

## UPDATING PHONE NUMBERS

The COD System only stores one phone number for each person.

### BUSINESS RULES

1. The Common Record allows for a maximum occurrence of three phone number tags per person; however, the COD System stores only one or the last occurrence (if more than one is submitted) of phone number as Home Phone.
  - a. The COD System does not store a value for Alternate Phone 1 or Alternate Phone 2.

## STUDENT ELIGIBILITY FIELDS (FORMERLY ABILITY TO BENEFIT)

Beginning in March 2015, the Student Eligibility Code tag is used in place of Ability to Benefit Code tag.

Beginning with the 2011-12 Award Year, the COD system started collecting Student Eligibility information from schools. The Student Eligibility data is applicable for the Pell Grant, TEACH Grant, and Direct Loan Programs. For applicable students without a high school diploma or its recognized equivalent, you are required to indicate which students were admitted on the basis of successfully passing an approved ATB test, or successfully earned 6 credits or the equivalent, or participated in a State process approved by the Secretary or were home schooled. For Award Years prior to 2011-12, if Student Eligibility data is submitted, the COD System will not store the Ability to Benefit data elements, and will not include the Student Eligibility tags in the common record response.

### Student Eligibility Code:

In March 2013, the COD System no longer accepts value of '05' as a valid Student Eligibility Code.

In March 2015, the COD System introduced new accepted values 08, 09, and 10.

In October 2015, the COD System no longer accepts the value of '08', and added the values of '11', '12', '13', and '14'.

In 2013-14, the <StudentEligibilityCode> was made to be a required field used to record the Student Eligibility for all awards, for all students. In March 2015, the <AbilityToBenefitCode> tag was retired and replaced with the <StudentEligibilityCode>.

In October 2015, the COD System will no longer accept value of '08' in the <StudentEligibilityCode> field and instead will capture the "State Authorized High School Equivalent Certificate" under value '07' (GED) which is renamed (GED or State Authorized High School Equivalent Certificate). The COD System will also introduce four new Student Eligibility Code Values of '11' (ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15A), '12' (ATB-Test Completed- 1st Enrolled 7/1/15 or After), '13' (ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15), and '14' (ATB- College Credits-1st Enrolled 7/1/15 or After).

In March 2023, the COD System will no longer accept values of '11' and '13' in the <StudentEligibilityCode> field for the 2023-24 and forward and will add the "Comprehensive Transition and Postsecondary (CTP) program" under value '15'. The COD System will also update the existing values '12' (ATB – Test Completed – 1st Enrolled 7/1/15 or After) to '12' (ATB – Test Completed – 1st Enrolled 7/1/12 or After) and '14' (ATB – College Credits – 1st Enrolled 7/1/15 or After) to '14' (ATB – College Credits – 1st Enrolled 7/1/12 or After). Additionally, the COD System will accept value of '03' (State Process) in the <StudentEligibilityCode> field and requires a school to submit the <AbilitytoBenefitStateCode> tag with an approved state value. The COD System will accept a new valid value of '13' (Texas Success Initiative (TSI) Assessment in the <AbilitytoBenefitTestCode> tag.

Student Eligibility Code	Title	Description	Valid Award Year
01	Ability to Benefit Testing Completed	—	2011-12 through 2014-15
01	ATB-Test Completed-1st Enrolled Before 7/1/12	The student first enrolled in any Title IV eligible postsecondary program before 7/1/ 2012 AND passed an approved ATB test.	2015-16 and forward
02	College Credits	—	2011-12 through 2014-15
02	ATB-College Credits-1st Enrolled Before 7/1/12	The student first enrolled in any Title IV eligible postsecondary program before 7/1/2012 AND was determined to have the ability to benefit based on completion of: •6 credit hours, •225 clock hours, or •the equivalent that are applicable toward a degree or certificate offered by your institution.	2015-16 and forward
03	State Process	The student is enrolled in an eligible career pathways program AND the state has been approved for an ability-to-benefit (ATB) State Process to allow students without high school diplomas to receive Federal student financial aid.	2023-24 and forward

Student Eligibility Code	Title	Description	Valid Award Year
04	Home Schooled	The student has completed a secondary school education in a homeschool setting treated as a homeschool or private school under State law, AND obtained a homeschool completion credential. If State law does not require a homeschool credential, the student has completed a secondary school education in a homeschool setting that qualifies as an exemption from compulsory school attendance requirements under State law.	2011-12 and forward
05	Other	—	Invalid for all award years
06	High School Diploma	The student has a high school diploma.	2013-14 and forward
07	GED certificate or state equivalent test	—	2013-14
07	GED or State Auth. H.S. Equivalent Certificate	The student has a General Educational Development (GED) certificate or a state certificate or transcript received after the student passed a State-authorized examination, e.g.: <ul style="list-style-type: none"> <li>• High School Equivalency Test (HiSET),</li> <li>• Test Assessing Secondary Completion (TASC),</li> <li>• California High School Proficiency Exam (CHSPE), or</li> <li>• Other State-authorized examination the State recognizes as equivalent to a high school diploma.</li> </ul>	2015-16 and forward
08	State Authorized High School Equivalent Certificate	—	Invalid for all award years
09	Academic Transcript of 2-yr Program Acceptable for Full Credit Transfer to a BA Program	The student has an academic transcript documenting successful completion of at least a two-year program that is acceptable for full credit toward a bachelor's degree.  Note: For graduate or professional programs where a high school diploma or its equivalent is not necessary for admission to the program and the student has a bachelor's degree, submit "09".	2015-16 and forward

Student Eligibility Code	Title	Description	Valid Award Year
10	Program Leads to at least an Assoc. Degree, Excelled in H.S. and met the Admissions Requirements	Student is seeking enrollment in an educational program that leads to at least an associate degree or its equivalent AND has not completed high school, but the institution documents that the student excelled academically in high school and has met the formalized, written policies of that postsecondary institution for admitting such students.	2015-16 and forward
11	ATB-Test Completed-1st Enrolled 7/1/12 to 6/30/15	The student first enrolled in any Title IV eligible postsecondary program on or after 7/1/2012 but before 7/1/2015, AND is currently enrolled in a Title IV eligible postsecondary program that is part of an eligible career pathway program, AND passed an approved ATB test.	2015 – 16 through 2022 - 23
12	ATB-Test Completed-1st Enrolled 7/1/12 or After	The student first enrolled in any Title IV eligible postsecondary program on or after 7/1/2012, AND is currently enrolled in a Title IV eligible postsecondary program that is part of an eligible career pathway program, AND passed an approved ATB test.	2015-16 and forward
13	ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15	Student first enrolled in any Title IV eligible postsecondary program on or after 07/1/2012 but before 7/1/2015, AND is currently enrolled in a Title IV eligible postsecondary program that is part of an eligible career pathway program, AND was determined to have the ability to benefit based on completion of: •6 credit hours, •225 clock hours, or • The equivalent that are applicable toward a degree or certificate offered by your institution.	2015 – 16 through 2022 - 23

Student Eligibility Code	Title	Description	Valid Award Year
14	ATB-College Credits-1st Enrolled 7/1/12 or After	Student first enrolled in any Title IV eligible postsecondary program on or after 7/1/2012, AND is currently enrolled in a Title IV eligible postsecondary program that is part of an eligible career pathway program, AND was determined to have the ability to benefit based upon satisfactory completion of <ul style="list-style-type: none"> <li>• 6 credit hours,</li> <li>• 225 clock hours, or</li> <li>• The equivalent that are applicable toward a degree or certificate offered by your institution.</li> </ul>	2015-16 and forward
15	Comprehensive Transition and Postsecondary (CTP) program	Student enrolled in the Comprehensive Transition and Postsecondary (CTP) programs	2023-24 and forward

Table 16

An em dash or “—” indicates no data.

The <StudentEligibilityCode> tag is used to report the following:

1. A student's eligibility to receive Federal Student Aid without a high school diploma or its recognized equivalent
  - a. The <AbilityToBenefitTestCode> tag is used to report the type of test the student completed to be eligible to receive Federal Student Aid.
  - b. The <AbilityToBenefitTestAdministratorCode> tag is used to report the specific test administrator for the students test.
  - c. The <AbilityToBenefitCompletionDate> tag is used to report the date that the student completed their Ability To Benefit, to become eligible to receive Federal Student Aid.
  - d. The <AbilityToBenefitStateCode> tag is used to report the state with the approved State Process in which the student is in a career pathways program.
  - e. Note: In March 2023, the '03' (State Process) value will be reinstated for the 2023-24 award year and forward.
2. The completion of high school or its equivalent (GED certificate, state equivalent test, or home school).
3. A “Student Eligibility Code Change” event will be created to track any changes.

## BUSINESS RULES

1. If the <StudentEligibilityCode> element is submitted with a value of '01' (ATB-Test Completed-1st Enrolled Before 7/1/12), '11' (ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15), or '12' (ATB-Test Completed- 1st Enrolled 7/1/12 or After), the COD System will require the ATB Test Code, Test Administrator Code, and Completion Date elements, unless the values are already stored on the system for that award.
2. For home schooled students without a high school diploma or its recognized equivalent, schools should submit the Student Eligibility Code of '04' (Home Schooled).
3. The COD System will validate the values submitted within the Student Eligibility Code data elements. The "Student Eligibility Code" elements can be submitted on the Common Records or via the [COD Website](#).
4. If the <StudentEligibilityCode> element is submitted with a value of '02' (ATB-College Credits-1st Enrolled Before 7/1/12), '04' (Home Schooled), '06' (High School Diploma), '07' (GED or State Auth. H.S. Equivalent Certificate), '09' (Academic Transcript of 2-yr Program Acceptable for Full Credit Transfer to a BA Program), '10' (Program Leads to at least an Assoc. Degree, Excelled in H.S. and met the Admissions Requirements), '13' (ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15), or '14' (ATB-College Credits-1st Enrolled 7/1/12 or After), or '15' (Comprehensive Transition and Postsecondary (CTP) program) no other Student Eligibility Code data elements are required.

**Note:** For graduate or professional programs where a high school diploma or its equivalent is not necessary for admission to the program, and the student has a bachelor's degree, submit '09'.

5. If a student already has an award on file, the Student Eligibility Code information will not be pre-populated when creating new awards in future. This will apply to awards both within the same program type and across program types.
6. If the COD System determines a Student Eligibility Code element has an invalid value, edit 996 will be returned for invalid value submitted.
7. The Student Eligibility Code data elements will be updateable and the COD System will allow schools to null out stored values.

**Note:** the COD System will return a value of '01-01-0001' in the <AbilityToBenefitCompletionDate> in the Common Record and Web response files if the <AbilityToBenefitCompletionDate> field has been nulled out by the school.

8. If a school submits an award origination record for any program with the Student Eligibility Code = '03' (State Process) and the Completion Date is not valid or is greater than the current COD processing date, reject Edit 195 will be triggered for 2024-25 and forward.
9. If a school submits an award origination record for any program with the Student Eligibility Code = '01' (ATB-Test Completed-1st Enrolled Before 7/1/12), '11' (ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15), or '12' (ATB-Test Completed- 1st Enrolled 7/1/12 or After) and the Completion Date is not valid for the submitted Test Code or the Completion Date is greater than the current COD processing date, reject Edit 196 will be triggered.
10. If a school submits an award origination record for any program with the Student Eligibility Code = '01' (ATB-Test Completed-1st Enrolled Before 7/1/12), '11' (ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15), or '12' (ATB-Test Completed- 1st Enrolled 7/1/12 or After ) and the school does

not submit the Ability to Benefit Test Administrator Code, Ability to Benefit Test Code, and the Ability to Benefit Completion Date data elements, reject Edit 197 will be triggered.

11. If a school submits an award origination record for any program with the Student Eligibility Code with a valid value and any combination of the additional Student Eligibility Code elements are also submitted with valid values, when they are not required for the Student Eligibility Code submitted, reject Edit 198 will be triggered.
12. As of March 2013, the COD System no longer accepts Student Eligibility Code '05' (Other) for all award years.
13. In March 2013, the COD System began accepting two new Student Eligibility values of '06' (High School Diploma) and '07' (GED certificate or state authorized high school equivalent certificate) for Award Years 2013-2014 and forward.
14. In October 2015, the COD System will no longer accept the Student Eligibility Code values of '08' (State Authorized High School Equivalent Certificate) and will introduce four new Student Eligibility Code Values of '11' (ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15), '12' (ATB-Test Completed- 1st Enrolled 7/1/12 or After), '13' (ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15), and '14' (ATB- College Credits-1st Enrolled 7/1/12 or After).
15. Beginning in October 2015, the COD System no longer accepts Student Eligibility Code of '08' (State Auth. H.S. Equivalent Certificate) for all award years and instead will capture the "State Authorized High School Equivalent Certificate" under value '07' (GED) which is renamed (GED or State Authorized High School Equivalent Certificate). The COD System will reject a value of '06' or '07' with reject edit 198 for Award Years 2012-2013 and prior. The COD System will reject a value of '09', '10', '11', '12', '13', and '14' with reject edit 198 for Award Years prior to 2015-2016.
16. In March 2023, the COD System no longer accepts the value of '11' (ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15) and '13' (ATB- College Credits-1st Enrolled 7/1/12 to 6/30/15) for the 2023-2024 award year and forward and will introduce a new Student Eligibility Code value of '15' (Comprehensive Transition and Postsecondary (CTP) program. The COD System will also update the existing values '12' (ATB – Test Completed – 1st Enrolled 7/1/15 or After) to '12' (ATB – Test Completed – 1st Enrolled 7/1/12 or After) and '14' (ATB – College Credits – 1st Enrolled 7/1/15 or After) to '14' (ATB – College Credits – 1st Enrolled 7/1/12 or After). The COD System will start to accept the Student Eligibility Code of '03' (State Process) and reinstate the <AbilitytoBenefitStateCode> tag for the 2024-2025 award year and forward. The COD System will accept a new valid value of '13' (Texas Success Initiative (TSI) Assessment) in the <AbilitytoBenefitTestCode> tag. The COD System will apply the updates on Student Eligibility Codes on Edits 196, 197, 198, 199 for the award year 2023-2024 and forward.

The following table includes the valid completion date for each of the Ability to Benefit Test Codes:

Test Code	Description	Valid Completion Date
01 – ASSET	ASSET Program: Basic Skills Test	November 1, 2002 to October 31, 2015
02 – CPAt	Career Programs Assessment (CPAt) Basic Skills Subtests	November 1, 2002 to June 30, 2015
03 – CELSA	Combined English Language Skills Assessment	November 01, 2002 to Present
04 – COMPASS	COMPASS Subtests	November 1, 2002 to October 31, 2015

05 – CPTs/ACCUPLACER	Computerized Placement Tests (CPTs)/ACCUPLACER	November 01, 2002 to Present
06 – DTLS/DTMS	Descriptive Tests: Language Skills and Mathematical Skills	November 01, 2002 to April 27, 2007
07 – COMPASS/ESL	ESL Placement Test (COMPASS/ESL)	May 19, 2006 to October 31, 2015.
08 – WBST	Wonderlic Basic Skills Test	October 25, 1996 to Mar 31, 2023
09 – WorkKeys	WorkKeys Program	March 11, 2005 to June 30, 2015
10 – TABE	Test of Adult Basic Education	November 01, 2002 to May 11, 2004
11 – SABE	Spanish Assessment of Basic Education	November 1, 2002 to October 31, 2015
12 – WBST-Spanish	Wonderlic Basic Skills Test – Spanish	Jul 1, 2015 to Mar 31, 2023
13 – TSI Assessment	Texas Success Initiative (TSI) Assessment	June 26, 2020 to Present

Table 17

The following table includes the valid completion date for each of the Ability to Benefit State Codes:

State Code	Description	Valid Completion Date
IL	Illinois	May 16, 2022 to May 15, 2025
MN	Minnesota	Aug 29, 2022 to Aug 29, 2025
MS	Mississippi	Apr 21, 2021 to Apr 20, 2024
WA	Washington	Jul 1, 2020 to Aug 17, 2028
WI	Wisconsin	May 1, 2020 to Apr 20, 2028
IA	Iowa	Mar 10, 2021 to Mar 9, 2024
CA	California	Jul 31, 2024 to Jul 31, 2029

Table 18



## ENROLLMENT SCHOOL CODE FIELD

With Award Year 2012-13 and forward, the COD System added the `<EnrollmentSchoolCode>` tag as a required tag in the Disbursement block for all Direct Loan, TEACH Grant, and Pell Grant awards. The Enrollment School Code is defined as the 8-digit OPE ID of the physical location where a student is attending classes. The COD System's processing rules for the `<EnrollmentSchoolCode>` tag will differ by award type. The `<EnrollmentSchoolCode>` tag will be stored for accepted Direct Loan, Pell Grant, and TEACH Grant awards. If submitted, the `<EnrollmentSchoolCode>` tag will be returned on Common Record Responses for all programs.

### Enrollment School Code Field:

For 2012-13 and forward, the `<EnrollmentSchoolCode>` tag was added to the disbursement block for all Direct Loan, TEACH Grant and Pell Grant awards.

## BUSINESS RULES

1. For Award Year 2012-13 and forward, the COD System will accept the `<EnrollmentSchoolCode>` tag.
2. The `<EnrollmentSchoolCode>` tag will be returned on Common Record Responses.
3. The COD System will verify that the `<EnrollmentSchoolCode>` tag is the correct format of eight numeric digits for all awards.
4. The COD System will also verify that the `<EnrollmentSchoolCode>` tag is an existing OPE ID for all Direct Loan, Pell and TEACH awards.
5. Origination:
  - a. The `<EnrollmentSchoolCode>` will be required on origination for Direct Loan, Pell and TEACH awards.
  - b. For Pell originations without disbursements, the `<EnrollmentSchoolCode>` tag will not be required.
6. Change
  - a. The COD System will update the `<EnrollmentSchoolCode>` if a change is submitted on Direct Loan, Pell and TEACH awards.
  - b. The `<EnrollmentSchoolCode>` will not be required on changes to actual and anticipated disbursements already existing on the COD System.
  - c. The disbursement sequence number must be incremented to change the `<EnrollmentSchoolCode>` on an actual disbursement.
  - d. The disbursement sequence number will not have to be incremented to change the `<EnrollmentSchoolCode>` on an anticipated disbursement.

7. The COD System will create a new event when the `<EnrollmentSchoolCode>` tag is updated on Direct Loan, Pell, or TEACH changes.
8. The `<EnrollmentSchoolCode>` tag will be required on award changes when a new disbursement is submitted for all Direct Loan, Pell, and TEACH submissions.
  - a. The `<EnrollmentSchoolCode>` tag will not be required on disbursement changes to an existing funded or anticipated disbursement for these awards.
  - b. The `<EnrollmentSchoolCode>` tag will be updated when a school submits a change on these awards.

## Direct Loan Award and Disbursement Process

### UTILIZING AWARD KEY FOR SUBSIDIZED AND UNSUBSIDIZED LOANS

The Award Key is a shortcut to avoid multiple submissions of tags where data is consistent across loans for a single borrower. This reference structure allows for more efficient transmission of loan information. Loan information that could be reported for multiple loans is “pulled up” to allow for a repeatable complex element.

#### BUSINESS RULES

1. There are two reference tags in the Common Record identified as Award Key:
  - a. The first tag is an attribute for DL Loan Information, `<DLLoanInformation AwardKey="1">`
  - b. The second tag is a simple element, `<AwardKey>`.
2. Both of these reference tags are required when submitting Direct Loan Award information.
3. These two reference tags link two sections of loan information together, expediting the reporting of similar data across Subsidized and Unsubsidized loans for a single borrower.
4. An Award Key number is referenced once but can be used by multiple Subsidized and Unsubsidized loans within the same submission.

*Please see Example 1.*

#### **Award Key Uniqueness:**

A PLUS loan within the same submission must have a unique Award Key number as some of the shared data elements in DL Loan Information always have different values for PLUS. Origination Fees for Subsidized, Unsubsidized, and PLUS loans may vary.

5. It is permissible to send a unique Award Key for each Subsidized and Unsubsidized loan. *Please see Example 2.*
6. An Award Key references the following data elements shared by Subsidized and Unsubsidized loans:
  - a. Origination Fee Percent, `<OriginationFeePercent>`
  - b. Interest Rebate Percent, `<InterestRebatePercent>`
  - c. Promissory Note Print Code, `<PromissoryNotePrintCode>`

- d. Disclosure Statement Print Code, <DisclosureStatementPrintCode>
- e. Student Level Code, <StudentLevelCode>
- f. Financial Award Begin Date, <FinancialAwardBeginDate>
- g. Financial Award End Date, <FinancialAwardEndDate>
- h. Academic Year Begin Date, <AcademicYearBeginDate>
- i. Academic Year End Date, <AcademicYearEndDate>

7. An Award Key number may only be referenced within that Common Record. The Direct Loan Information Award Key number is not stored on the COD System and, therefore, the Award Key number cannot be used in a subsequent Common Record to reference data submitted in the DL Loan Information block of a prior Common Record.

#### Example 1: One Award Key

In this example, there is one Award Key. The AwardKey = "1" can be used for a Subsidized and Unsubsidized loan. If this student submission also included a PLUS loan, this same AwardKey = "1" could not be used for a PLUS loan. Since the information in AwardKey = "1" is not applicable to the PLUS loan (such as the origination fee), the PLUS loan must have a unique Award Key such as AwardKey = "2".

Below is the content of DL Loan Information and of the DL Subsidized and DL Unsubsidized complex elements:

```
<DLLoanInformation AwardKey="1">
<OriginationFeePercent>1</OriginationFeePercent>
<InterestRebatePercent>0</InterestRebatePercent>
<PromissoryNotePrintCode>0</PromissoryNotePrintCode>
<DisclosureStatementPrintCode>Y</DisclosureStatementPrintCode>
<StudentLevelCode>1</StudentLevelCode>
<FinancialAwardBeginDate>2024-09-01</FinancialAwardBeginDate>
<FinancialAwardEndDate>2025-05-15</FinancialAwardEndDate>
<AcademicYearBeginDate>2024-09-01</AcademicYearBeginDate>
```

```
<AcademicYearEndDate>2025-05-15</AcademicYearEndDate></DLLoanInformation>  
  
<DLSubsidized>  
  
<AwardKey>1</AwardKey>  
  
<FinancialAwardYear>2025</FinancialAwardYear>  
  
<FPSTransactionNumber>4</FPSTransactionNumber>  
  
<FinancialAwardAmount>2625</FinancialAwardAmount>  
  
<DependencyStatusCode>D</DependencyStatusCode>  
  
<FinancialAwardNumber>1<FinancialAwardNumber>  
  
<FinancialAwardID>123456789S25G12345001</FinancialAwardID>  
  
<DirectLoanAttendanceCost>10000</DirectLoanAttendanceCost>  
  
<FinancialAwardCreateDate>2024-07-01</FinancialAwardCreateDate>  
  
<StudentEligibilityCode>07</StudentEligibilityCode>  
  
</DLSubsidized>  
  
<DLUnsubsidized>  
  
<AwardKey>1</AwardKey>  
  
<FinancialAwardYear>2025</FinancialAwardYear>  
  
<FPSTransactionNumber>4</FPSTransactionNumber>  
  
<FinancialAwardAmount>1000</FinancialAwardAmount>  
  
<DependencyStatusCode>D</DependencyStatusCode>  
  
<FinancialAwardNumber>1<FinancialAwardNumber>  
  
<FinancialAwardID>123456789U25G12345001</FinancialAwardID>  
  
<DirectLoanAttendanceCost>4000</DirectLoanAttendanceCost>
```

```
<FinancialAwardCreateDate>2023-07-01</FinancialAwardCreateDate><StudentEligibilityCode>07</StudentEligibilityCode>  
<AdditionalUnsubsidizedEligibilityIndicator>true</AdditionalUnsubsidizedEligibilityIndicator>  
</DLUnsubsidized>
```

In this example, all of the Award Key content equals one. Therefore, the COD System knows the information in <DLLoanInformation> can be used for both the <DLSubsidized> and <DLUnsubsidized>.

#### Example 2: Separate Award Keys for Sub, Unsub Loans

In this example, there are two Award Keys. The AwardKey = "1" is used for the Subsidized loan and the AwardKey = "2" is used for the Unsubsidized loan. If this student submission also included a PLUS loan, the PLUS loan requires a unique Award Key that is not equal to 1 or 2 (which could be AwardKey = "3").

Submitting DLLoanInformation in this manner does NOT take advantage of the short cut described in the Example 1 for transmission of loan information. In this example, the same Loan information is reported multiple times within the same submission.

Below is the content of DLLoanInformation for a student receiving a Subsidized and an Unsubsidized loan where a unique Award Key is used for each loan.

```
<DLLoanInformation AwardKey="1">  
<OriginationFeePercent>1</OriginationFeePercent>  
<InterestRebatePercent>0</InterestRebatePercent>  
<PromissoryNotePrintCode>S</PromissoryNotePrintCode>  
<DisclosureStatementPrintCode>Y</DisclosureStatementPrintCode>  
<StudentLevelCode>1</StudentLevelCode>  
<FinancialAwardBeginDate>2024-09-01</FinancialAwardBeginDate>  
<FinancialAwardEndDate>2025-05-15</FinancialAwardEndDate>  
<AcademicYearBeginDate>2024-09-01</AcademicYearBeginDate>  
<AcademicYearEndDate>2025-05-15</AcademicYearEndDate>
```

```
</DLLoanInformation>

<DLLoanInformation AwardKey="2">

<OriginationFeePercent>1</OriginationFeePercent>

<InterestRebatePercent>0</InterestRebatePercent>

<PromissoryNotePrintCode>0</PromissoryNotePrintCode>

<DisclosureStatementPrintCode>Y</DisclosureStatementPrintCode>

<StudentLevelCode>1</StudentLevelCode>

<FinancialAwardBeginDate>2024-09-01</FinancialAwardBeginDate>

<FinancialAwardEndDate>2025-05-15</FinancialAwardEndDate>

<AcademicYearBeginDate>2024-09-01</AcademicYearBeginDate>

<AcademicYearEndDate>2025-05-15</AcademicYearEndDate>

</DLLoanInformation>

<DLSubsidized>

<AwardKey>1</AwardKey>

<FinancialAwardYear>2025</FinancialAwardYear>

<FPSTransactionNumber>4</FPSTransactionNumber>

<FinancialAwardAmount>2625</FinancialAwardAmount>

<DependencyStatusCode>D</DependencyStatusCode>

<FinancialAwardNumber>1</FinancialAwardNumber>

<FinancialAwardID>123456789S25G12345001</FinancialAwardID>

<DirectLoanAttendanceCost>3000</DirectLoanAttendanceCost>

<FinancialAwardCreateDate>2023-07-01</FinancialAwardCreateDate>
```

```
<StudentEligibilityCode>07</StudentEligibilityCode>
<Disbursement Number="1">
<DisbursementAmount>1000</DisbursementAmount>
<DisbursementDate>2024-10-13</DisbursementDate>
<DisbursementReleaseIndicator>true</DisbursementReleaseIndicator>
<DisbursementSequenceNumber>2</DisbursementSequenceNumber>
<EnrollmentSchoolCode>12345678</EnrollmentSchoolCode>
<PaymentPeriodStartDate>2024-10-13</PaymentPeriodStartDate>
<PaymentPeriodEndDate>2025-06-30</PaymentPeriodEndDate>
<EnrollmentStatus>F</EnrollmentStatus>
<CIP Number="1">
<ProgramCIPCode>15.0805</ProgramCIPCode>
<PublishedPgmLengthMonths>18</PublishedPgmLenghtMonths>
<WeeksProgramsAcademicYear>26</WeeksProgramsAcademicYear>
<SpecialPrograms>B<SpecialPrograms>
<ProgramCredentialLevel>3</ProgramCredentialLevel>
</CIP>
<ProgramCIPCodeYear>2020</ProgramCIPCodeYear>
<DisbursementNetAmount>995.00</DisbursementNetAmount>
<DisbursementFeeAmount>15.00</DisbursementFeeAmount>
<InterestRebateAmount>0</InterestRebateAmount>/<Disbursement>
</DLSubsidized>
```



```
<DLUnsubsidized>
<AwardKey>2</AwardKey>
<FinancialAwardYear>2025</FinancialAwardYear>
<FPSTransactionNumber>4</FPSTransactionNumber>
<FinancialAwardAmount>1000</FinancialAwardAmount>
<DependencyStatusCode>D</DependencyStatusCode>
<FinancialAwardNumber>1</FinancialAwardNumber>
<FinancialAwardID>123456789U25G12345001</FinancialAwardID>
<DirectLoanAttendanceCost>3000</DirectLoanAttendanceCost>
<FinancialAwardCreateDate>2022-07-01</FinancialAwardCreateDate>
<StudentEligibilityCode>07</StudentEligibilityCode>
<AdditionalUnsubsidizedEligibilityIndicator>true
</AdditionalUnsubsidizedEligibilityIndicator>
<Disbursement Number="1">
<DisbursementAmount>1000</DisbursementAmount>
<DisbursementDate>2024-10-13</DisbursementDate>
<DisbursementReleaseIndicator>true</DisbursementReleaseIndicator>
<DisbursementSequenceNumber>2</DisbursementSequenceNumber>
<FirstDisbursementIndicator>true</FirstDisbursementIndicator>
<DisbursementNetAmount>995.00</DisbursementNetAmount>
<DisbursementFeeAmount>20.00</DisbursementFeeAmount>
<PaymentPeriodStartDate>2023-10-13</PaymentPeriodStartDate>
```

```
<PaymentPeriodEndDate>2025-06-30</PaymentPeriodEndDate>  
<EnrollmentStatus>F</EnrollmentStatus>  
<CIP Number="1">  
<ProgramCIPCode>15.0805</ProgramCIPCode>  
<PublishedPgmLengthMonths>18</PublishedPgmLengthMonths>  
<WeeksProgramsAcademicYear>26</WeeksProgramsAcademicYear>  
<SpecialPrograms>B<SpecialPrograms>  
<ProgramCredentialLevel>3</ProgramCredentialLevel>  
</CIP>  
</DLUnsubsidized>
```

In this example, the DLSubsidized and DLUnsubsidized have unique Award Key content. Therefore, the DLLoanInformation cannot be “pulled up” and the DLLoanInformation complex element is submitted twice with information for each loan.

## DISBURSEMENT SEQUENCE NUMBER REQUIRED ON ALL DISBURSEMENTS

A Disbursement Sequence Number must be reported for all disbursements. This is an indicator of a single transaction associated with a specific disbursement number.

### BUSINESS RULES

1. The Disbursement Sequence Number determines the order in which the transaction must be processed for a given Disbursement Number.
2. The Disbursement Sequence Number must be reported in an incremental, ascending order.
3. The Disbursement Sequence Number valid values range from 1-99.
  - a. Disbursement Sequence Numbers 1-65 are reported by schools.
  - b. Disbursement Sequence Numbers 66-90 are reserved for COD system-generated adjustments to disbursements, COD web generated disbursements, and anticipated/actual disbursement information submitted online via the [COD Website](#).

- c. Disbursement Sequence Numbers 91-99 are reserved for Direct Loan Payment to Servicer transactions (in descending order).
4. The Disbursement Sequence Number must be reported as 1 when the Disbursement Release Indicator is set to false.
5. The Disbursement Sequence Number must be set to 1 the first time the disbursement is reported with the Disbursement Release Indicator set to true.
6. Duplicate Disbursement Sequence Numbers for the same Disbursement Number when the Disbursement Release Indicator is set to true are considered duplicate disbursement transactions.
7. When resubmitting a disbursement transaction that was rejected, the resubmission must use the same Disbursement Sequence Number that was rejected.
8. The `<DisbursementSequenceNumber>` tag is returned in the disbursement response complex element in all Full or Standard Common Record Responses.
9. The `<PreviousSequenceNumber>` tag is returned in all Common Record disbursement response complex elements with Disbursement Sequence Number greater than 01, including COD system-generated ND, PS, and WB responses, to indicate the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

## DISBURSEMENT RELEASE INDICATOR

The Disbursement Release Indicator tag is used to identify disbursements that have been made or will be made in the near future to the student/borrower, and that are used to substantiate cash that has been drawn down or may lead to a change in the Current Funding Level (CFL).

### BUSINESS RULES

1. Disbursement information is submitted to the COD System with a Disbursement Release Indicator equal to true or false.
  - a. Disbursements with a Disbursement Release Indicator set to false do NOT change the CFL. False indicates anticipated disbursement information.
  - b. Disbursements with a Disbursement Release Indicator set to true may change the CFL. True indicates actual disbursement information.
  - c. If the Disbursement Release Indicator is omitted from the Common Record, the COD System sets it to false.

For more information, please refer to the Submitting Direct Loan Disbursement Information and Disbursement Release Indicator topic.

2. Depending on the school's Cash Monitoring status, the COD System may accept Disbursement information with Disbursement Release Indicator set to true in advance of, on, or after the disbursement date.

For information on the required tags in the Disbursement complex element, refer to the Minimum Data Elements Required for Document Processing topic.

3. If the Disbursement Release Indicator is set to true, the disbursement is processed only if the required tags in the Disbursement complex element are complete.
4. The Disbursement Release Indicator cannot be changed from true to false.
5. Disbursement information with a Disbursement Release Indicator set to true is not accepted more than 7 calendar days before the disbursement date. Disbursement information submitted 7 days or less before the disbursement date may result in a change to the School's Current Funding Level (CFL).

Please refer to the Updating and Adjusting Direct Loan Disbursement Amounts and Dates topic for more information.

6. To make an adjustment to an accepted and posted actual disbursement, the Disbursement Release Indicator must be set to true.
7. The Disbursement Release Indicator can be updated and disbursements can be generated, updated and adjusted on the [COD Website](#).

## ESTABLISHING AN INITIAL DIRECT LOAN AWARD

Disbursement information is required when creating all initial Direct Loan awards (Subsidized, Unsubsidized and PLUS) on the web or by Common Record submission to the COD System. Disbursement information is required on initial Direct Loan awards in order to produce accurate Disclosure Statements and to calculate the repayment period for PLUS borrowers.

### BUSINESS RULES

1. A person is not established on the COD System if an award rejects that contains a new student identifier or a change to a student identifier.
2. The award is not linked to an MPN if the award rejects when establishing an initial Direct Loan award.

**Note:** For more information about MPN linking, please refer to the *Linking an MPN to a Direct Loan Subsidized/Unsubsidized or PLUS Award* topic.

3. A complete address is required; however it does not have to be submitted if it is found and pulled from the FPS or COD database.
  - a. The data elements for a complete address are:
    - i. Address, <AddressLine>
    - ii. City, <AddressCity>

- iii. State/Province Code <StateProvinceCode>
  - iv. Postal Code, <PostalCode>
  - v. Country Code, <AddressCountryCode> (for international addresses only)
- b. If any of the address fields are blank, COD will attempt to pull the entire address from FPS or the COD database.
- i. The COD System will pull the student address for the highest FPS transaction number for the most recent award year.
  - ii. If a complete address cannot be found on FPS or the COD database, the record will reject (Edit 021).
    - The school must resubmit the record with a complete address.
- c. If a complete address is found on FPS or the COD database, the record will accept and the school will receive a warning message that a complete address exists on COD (Edit 120).
- d. Warning edit 214 will be triggered on the borrower level if a domestic address is not submitted in the Permanent or Alternates Address country block on origination or maintenance of a Direct PLUS loan.
4. The Dependency Status tag is a required field for all Direct Loan Subsidized and Unsubsidized originations.
- a. The Dependency Status tag is not required for award change records.
5. The Additional Unsubsidized Indicator is a required field for all Direct Loan Unsubsidized originations.
- a. The Additional Unsubsidized Indicator is not a required field for award change records.
6. A PLUS award will be built on the COD System when submitted regardless of the credit check decision, as long as the award is submitted with anticipated disbursement records (DRI equal to false).
- a. If the PLUS award is submitted with actual disbursements and the credit decision is denied or pending, the award will be rejected. In addition, changes to award information and student borrower identifiers will be rejected. Note: The COD System will allow the award amount and disbursement amount(s) to be reduced to zero. In these cases, all required tags to originate an award must be submitted.
7. The COD System requires submission of all disbursement information when establishing an award via the Common Record or the COD Website. Required disbursement information includes:
- a. All anticipated disbursements (Disbursement Release Indicator = false), or
  - b. All actual disbursements (Disbursement Release Indicator = true), or

- c. A combination of actual disbursements (Disbursement Release Indicator = true) and anticipated disbursements (Disbursement Release Indicator = false)

8. The following disbursement level data elements are required for establishing a Direct Loan award:

- a. Disbursement Date
- b. Disbursement Number
- c. Disbursement Sequence Number
- d. Disbursement Amount
- e. Disbursement Fee Amount
- f. Interest Rebate Amount
- g. Disbursement Net Amount
- h. Disbursement Release Indicator
- i. Enrollment Status
- j. Program CIP Code
- k. Payment Period Start Date
- l. Payment Period End Date
- m. Enrollment School Code
- n. Published Program Length Years
- o. Published Program Length Months
- p. Published Program Length Weeks
- q. Weeks Programs Academic Year
- r. Special Programs
- s. Program Credential Level

**Published Program Length:**

One of these three tags should be reported: Published Program Length Years, Published Program Length Months, or Published Program Length Weeks. If more than one of the elements is reported the system will reject with the new reject edit 202.

**Weeks Programs Academic Year:**

If Published Program Length Weeks or Published Program Length Months is reported, Weeks Programs Academic year is required, if not the system will reject the record with edit 994.

9. Schools cannot submit a single disbursement equal to the award amount unless the school meets one of the multiple disbursement exemption criteria. Exemptions include:
  - a. A single disbursement equal to the award amount may be made for a loan for a student in an eligible study abroad program, regardless of the length of the loan period, if the school's most recently calculated Stafford loan default rate is less than 5 percent for the single most recent fiscal year for which data is available.
10. The COD System compares the sum of the disbursements (anticipated and/or actual) to the Award Amount.
  - a. If the sum of the disbursements does not equal the Award Amount, the award rejects with error code 117.
11. The entire award rejects with error code 117 if any disbursements (anticipated or actual) reject, or if all disbursement information is not included in the origination.
12. A maximum of twenty disbursements are allowed on each distinct PLUS loan.

## SUBMITTING DIRECT LOAN ANTICIPATED DISBURSEMENT INFORMATION

Direct Loan Anticipated Disbursement information can be submitted using the Common Record to the COD System to originate a loan. Complete disbursement information is required when originating all Direct Loan awards. Complete disbursement information can include anticipated disbursements, actual disbursements, or a combination of anticipated and actual disbursements. When anticipated disbursement information is sent, disbursement edits are performed, the COD System can generate Disclosure Statements, when appropriate, and anticipated disbursements are reflected on the Pending Disbursement List report.

## BUSINESS RULES

1. Anticipated Disbursement information with a Disbursement Release Indicator set to false indicates anticipated disbursements.
2. Complete Disbursement information is required when establishing a Direct Loan award. The sum of all disbursements (anticipated and/or actual) must equal the Award Amount.

3. The Response from a Record containing Anticipated Disbursement information for a Subsidized and Unsubsidized loan provides the MPN Status and MPN Indicator.
4. Anticipated Disbursement information is processed by the COD System and serves as an early detection for any edit issues, which may cause the record to reject at the time of disbursement. For example, the student identifier match with the FPS is performed at the Person and Award level if these are not accepted then the disbursement will reject.
5. Including Disbursement information with a Disbursement Release Indicator set to false allows for the timely generation of Disclosure Statements and the calculation of the repayment period for PLUS borrowers.

## GENERATING DISCLOSURE STATEMENTS

Disclosure Statements are generated for subsidized, unsubsidized and PLUS loans.

### BUSINESS RULES

1. COD generates Disclosure Statements for all loan types (subsidized, unsubsidized and PLUS loans).
2. Disclosure Statement Print Code is a data element on the Common Record indicating whether the school or COD sends the Disclosure Statement.
3. The valid values for the Disclosure Statement Print Code are:
  - a. Y COD prints and sends to borrower
  - b. R COD reprint
  - c. S School Prints and Sends to Borrower
4. The COD System does NOT send a Disclosure Statement when the Disclosure Statement Print Code on the Common Record has a value of S (School prints and sends to borrower).
5. If an award does not contain the Disclosure Statement Print Code, the COD System defaults to the option on the school profile when processing the award.

#### Omitting the Disclosure Statement Print Code:

For more information please refer to the *Disclosure Statement Print Option* topic.

6. Disclosure Statements sent by a school must be generated on the approved Disclosure Statement form.



- a. When printing the Disclosure Statement, it is recommended to use Courier, 10 point, 12 pitch font.

**eCorrespondence:**

Borrowers can choose to receive COD generated correspondence and Servicer correspondence electronically. Borrowers sign up for this service on StudentAid.gov. Borrowers who do not choose to receive correspondence electronically will receive correspondence through the U.S. Postal Service.

7. The party (school or COD) who is responsible for generating and sending the Disclosure Statement is also responsible for generating and sending the Plain Language Disclosure Statement, when the Disclosure Statement is for a subsequent loan under an MPN.
8. Disclosure Statements must be provided to the Student borrower (for Subsidized and Unsubsidized) or Parent or Graduate Student borrower (for PLUS) before or at the time of the first disbursement.
9. The COD System does NOT send a Disclosure Statement for a PLUS award until the award has an approved credit decision.
10. For Subsidized and Unsubsidized loans, the COD System generates a Disclosure Statement 7 calendar days before the first disbursement date.
11. For PLUS loans, the COD System generates a Disclosure Statement 7 calendar days before the first disbursement date, if there is an approved credit decision.
12. If the disbursement information is submitted to the COD System less than 7 calendar days before the first disbursement date, the Disclosure Statement is generated immediately, unless the School indicated that it provided the Disclosure Statement.
13. The COD System generates and sends a Disclosure Statement for a PLUS award upon receipt of an approved credit decision if the 7-day criterion has passed, unless the Disclosure Statement Print Code on the award or the school's print profile indicates that the school provides the Disclosure Statement.
14. The COD System generates and sends a Disclosure Statement unless the school's print profile indicates that the school provides the Disclosure Statement. The Disclosure statement is printed only once for each loan unless the school requests a reprint.
15. The COD System reprints and resends the Disclosure Statement when the Disclosure Statement Print Code = R.
16. The COD System does NOT automatically reprint Disclosure Statements when changes to the Award Amount, Disbursement Dates, or Disbursement Amounts are received.
17. When a Disclosure Statement is reprinted, the data printed on the statement is the current data in the COD System and may not match the original disclosure statement.
18. When a request is received to reprint the Disclosure Statement for a subsequent award under an MPN, the school or COD System, depending on who has responsibility for printing the Disclosure Statement, reprints the Plain Language Disclosure.
19. The COD system requires schools to provide all disbursement information prior to disbursement.

**Printing Disclosure Statements Based on School Options and Disclosure Statement Print Code**

School Option set within COD System	Disclosure Statement Print Code	COD System Prints
School prints	Null or No tag	NO
School prints	S (School prints)	NO
School prints	Y (COD prints and sends to borrower) R (COD reprint)	YES
COD prints	Null or no tag	YES
COD prints	S (School prints)	NO
COD prints	Y (COD prints and sends to borrower) R (COD reprint)	YES

Table 20

**When COD Prints a Disclosure Statement based on receipt of Disbursement Information**

Disb. Info Submitted	Date Disbursement Info Submitted	Disbursement Release Indicator	Disbursement Date	Disclosure Statement Generated by COD
7 calendar days prior to first disbursement	09-03-2012	true or false	09-10-2012	09-03-2012
On Disbursement Date	09-10-2012	true or false	09-10-2012	09-10-2012

Table 21

The COD System performs annual Loan Limit edits at both the award and disbursement levels. The applicable loan limit is determined by the Earliest Disbursement Date for that award, as well as grade level, loan type, dependency status and flags, such as the Additional Unsubsidized Indicator (AUI), Health Professions (HPPA) and Preparatory Coursework for Admission to a Graduate/Professional program/Teacher Certification (PPCI).

If the **PreProfessional Coursework Indicator (PPCI)** is set to true, please refer to the *PPCI* column.

If the **Health Professions (HPPA)** flag is set to “Y”, please refer to the *HPPA Loan Limit* column. HPPA only applies to Domestic Schools.

For Direct Loans first disbursed **on or after July 1, 2012**, the following loan limits apply:

#### Direct Loan Limits

Grade Level	Subsidized Loan Limit	Combination Base Loan Limit	Additional Unsubsidized Loan Limit	PPCI Loan Limit	HPPA Loan Limit
0 or 1	\$3,500	\$5,500	\$9,500	—	—
2	\$4,500	\$6,500	\$10,500	—	—
3, 4, 5	\$5,500	\$7,500	\$12,500	\$12,500	—
6 or 7	0	\$8,500	\$20,500	—	\$47,167

Table 22

An em dash or “—” indicates no data.

**Note:** Beginning July 1, 2012, Graduate and Professional students (Grade Level 6 and 7) will no longer be eligible to receive Direct Loan Subsidized awards with an Award Begin Date on or after 7/1/12.

## AWARD LEVEL EDITING

### Direct Loan Cost of Attendance

Beginning with 2022-2023 award year, the COD System will collect Direct Loan Cost of Attendance for Direct Subsidized, Direct Unsubsidized and Direct PLUS awards.

### BUSINESS RULES

1. The COD System will require <DirectLoanAttendanceCost> tag in the award block for a new Direct Loan (DL Subsidized, DL Unsubsidized and DL PLUS) award for award years 2022-23 and forward.
2. If the Direct Loan Cost of Attendance amount is less than the Direct Loan Award amount (DL Subsidized, DL Unsubsidized, DL PLUS), the COD System will reject the award with Edit 226.

## INFORMED BORROWING

Beginning with 2021-22 award year, borrowers may acknowledge on StudentAid.gov that they have reviewed their outstanding loan balance or if they have no loan balance, the average loan balance at the school they plan to attend.

## BUSINESS RULES

1. The COD System will include the Informed Borrowing fields in the Direct Loan Award Level Response block. The COD System will send the following tags:
  - a. `<InformedBorrowingComplete>`
  - b. `<InformedBorrowingCompletionDate>`
  - c. `<InformedBorrowingID>`
2. Applies to Direct Subsidized, Direct Unsubsidized and Direct PLUS Loans
  - a. This will be applicable to undergraduate students receiving Direct Subsidized and Direct Unsubsidized Loans
  - b. This will be applicable to graduate students receiving Direct Unsubsidized and Direct PLUS Loans
  - c. This will be applicable to parents borrowing Direct PLUS Loans for dependent undergraduate students
3. The COD System will ignore these tags if included in the common record (i.e. inbound) file

## SUBSIDIZED LOAN LIMIT

If the cumulative Subsidized award amount exceeds the Subsidized Loan Limit, Reject Edit 167 will be triggered and COD will reject the award. Edit 167 is performed on all Subsidized awards regardless of a student's Dependency Status or Additional Unsubsidized Indicator value on other applicable awards.

## COMBINATION BASE LOAN LIMIT

The Combination Base Loan Limit is enforced when all of the conditions are met:

- The student has a Dependent Status on all applicable awards
- The student has an Unsubsidized Direct Loan award
- All applicable Unsubsidized awards have an AUI = 'false'

If an award is submitted that will cause the cumulative award amount of all applicable Subsidized and/or Unsubsidized awards at a single school to exceed the Dependent Combination Base Loan Limit at the highest applicable Grade Level, Edit 157 will be triggered.

## ADDITIONAL UNSUBSIDIZED LOAN LIMIT

The Additional Unsubsidized Loan Limit is enforced when at least one of the conditions are met:

- The student is Independent
- The student has an applicable award with an Additional Unsubsidized Indicator = 'true'
- Student has an Unsubsidized DL award.

Edit 039 will continue to be triggered when an award is submitted that will cause the cumulative award amount of all applicable Subsidized and/or Unsubsidized awards at a single school to exceed the Additional Unsubsidized Loan Limit at the highest applicable Grade Level.

## BUSINESS RULES FOR ALL LOAN LIMIT EDITING AT THE AWARD LEVEL

1. The COD System performs the award level edit when a loan is being established or updated. This includes the following actions:
  - a. Upward adjustment to Award Amount
  - b. Change to Academic Begin and/or End Dates
  - c. Change to Grade Level
  - d. Change to Health Professions flag
  - e. Change to PPCI flag
  - f. Earliest Disbursement Date

- g. Dependency Status Code
  - h. Additional Unsubsidized Indicator Grade Level
2. The COD System uses the incoming loan as the basis for selecting other loans on the system to use in the loan limit calculation. The system uses the following criteria when selecting these loans:
- a. Earliest Disbursement Date
    - i. This will be used to determine the set of loan limits that are applicable
  - b. Subsidized or Unsubsidized loans
  - c. Loans were received at the same attended school
  - d. Loans belong to the same student
  - e. Loans have award amounts greater than 0
  - f. The Academic Year Start and End Dates of the incoming loan
    - i. Wholly contain the Academic Year of the other loan
    - ii. Are wholly within the Academic Year of the other loan or
    - iii. Are equal to the Academic Year dates of the other loan
  - g. The COD System excludes any discharged amounts or payments to Servicing within 120 days of disbursement from the calculation.
  - h. The COD System uses Dependency Status and the Additional Unsubsidized Indicator to determine which loan limit edit to apply.
3. COD will use correcting edit 219 to reduce an award amount to be equal to the sum actual and anticipated disbursements
- a. Correcting Edit 219 will be returned on the `<FinancialAwardAmount>` tag
  - b. The corrected value will be included in the `<ResponseErrorValue>` tag.
  - c. The edit will only trigger for Award Years 2016-17 and forward.
  - d. The following is an XML example of what may be included in the response block:

`<Response>`

```
<ResponseCode>C</ResponseCode>  
  
<EditProcessResult>  
  
<ResponseErrorCode>219</ResponseErrorCode>  
  
<ResponseErrorField>FinancialAwardAmount</ResponseErrorField>  
  
<ResponseErrorValue>2000</ResponseErrorValue>  
  
</EditProcessResult>  
  
</Response>
```

In October 2016, COD introduced correcting edit logic to the Direct Loan program. Schools do not have the option to select between 'correcting' or 'rejecting' processing options for the Direct Loan program.

### **BUSINESS RULES FOR LOAN LIMIT EDITING AT THE AWARD LEVEL: FOR DEPENDENT STUDENTS NOT RECEIVING AN ADDITIONAL UNSUBSIDIZED AMOUNT (EDIT 157)**

The following applies to dependent students who aren't receiving an additional unsubsidized amount. For these students, the annual loan limit edit (Edit 157) is run to ensure that the students combined Subsidized/Unsubsidized awards don't exceed the Dependent Combination Base Loan Limit for the academic year.

1. If the Dependency Status is "D" and the Additional Unsubsidized Indicator is false on all awards in the applicable loan range, the COD System determines whether the student exceeds the Dependent Combination Base Loan Limit at the Attended School on the incoming record.
  - a. The COD System determines whether the loan amount on the incoming record will cause the student to exceed the maximum Base Annual Limit for the highest student level reported for the selected loans or incoming loan.
  - b. The COD System uses both subsidized and unsubsidized loans when determining whether the incoming record will cause the student to exceed the Base Annual Limit.

### **BUSINESS RULES FOR LOAN LIMIT EDITING AT THE AWARD LEVEL: FOR INDEPENDENT STUDENTS AND DEPENDENT STUDENTS ELIGIBLE FOR AND RECEIVING AN ADDITIONAL UNSUBSIDIZED AMOUNT (EDIT 39)**

The following applies to independent students and dependent students who are receiving an additional unsubsidized amount. For these students, the annual loan limit edit is to ensure that the student's combined Subsidized/Unsubsidized awards don't exceed the Maximum Combined Limit for the academic year.

1. If the Dependency Status is "I" and the Additional Unsubsidized Indicator is false OR the Dependency Status is "D" and the Additional Unsubsidized Indicator is true on any selected award, the COD system determines whether or not the loan amount on the incoming record will cause the student to exceed his/her Base Annual Loan Limit at the attended school.

- a. The COD System determines whether the loan amount on the incoming loan will cause the student to exceed the maximum Subsidized amount for the highest student level reported for the selected loans or incoming loan.
  - b. The COD System uses only subsidized loans when determining whether the incoming record will cause the student to exceed the maximum Subsidized amount.
  - c. The COD System uses the Subsidized Loan Limit as the maximum Subsidized amount.
2. If the Dependency Status is “I” and the Additional Unsubsidized Indicator is false OR the Dependency Status is “D” and the Additional Unsubsidized Indicator is true, the COD System determines whether the loan amount on the incoming record will cause the student to exceed the highest Additional Unsubsidized Loan Limit (base plus additional unsubsidized amounts) for the loans included in the calculations. The highest loan limit is determined by looking at the student level code, the Health Professions flag, the PPCI flag, and Earliest Disbursement Date for the selected loans for incoming loan.

## DISBURSEMENT LEVEL EDITING

If an actual disbursement on a subsidized award will cause the Subsidized Loan Limit to be exceeded, Edit 167 will be returned Edit 039 will continue be triggered if the sum of all actual disbursements across schools for both Subsidized and Unsubsidized awards exceed the Additional Unsubsidized Loan Limits.

### BUSINESS RULES FOR DISBURSEMENT LEVEL EDITING

1. The COD System performs at the disbursement level when the actual disbursement is submitted OR the actual disbursement is increased and the student attends more than one school.
  - a. Establish a new actual disbursement
  - b. Upward adjustment to Disbursement Amount
  - c. Change to Academic Begin and/or End Dates
  - d. Change to Grade Level
  - e. Change to Health Professions Flag
  - f. Change to PPCI Flag
  - g. Earliest Disbursement Date
2. The COD System uses the incoming loan as the basis for selecting other loans on the system to use in the loan limit calculation. The system uses the following criteria when selecting these loans:



- a. Earliest Disbursement Date
    - i. This will be used to determine the set of loan limits that are applicable
  - b. Subsidized or Unsubsidized loans
  - c. Loans received at any attended school
  - d. Loans belong on the same student
  - e. Loans have award amounts greater than 0
  - f. The Academic Year Start and End Dates of the incoming loan
    - i. Wholly contain the Academic Year of the other loan
    - ii. Are wholly within the Academic Year of the other loan or
    - iii. Are equal to the Academic Year dates of the other loan
3. The COD System determines whether or not the disbursement amount on the loan incoming record will cause the student to exceed his/her annual loan limit across all attended schools.
- a. The COD System determines whether the disbursement amount on the incoming record will cause the student to exceed the maximum Subsidized amount for the highest student level reported for the selected loans or incoming loan.
    - The COD System uses only actual disbursements for subsidized loans when determining whether the incoming record will cause the student to exceed the maximum Subsidized amount.
    - The COD System uses the Annual Base Amount as the maximum Subsidized amount.
  - b. The COD System determines whether the disbursement amount on the incoming record will cause the student to exceed the highest maximum combined amount (base plus additional unsubsidized amounts) for the loans included in the calculations. The highest loan limit is determined by looking at the student level code, the Health Professions flag, the PPCI flag, and Earliest Disbursement Date for the selected loans or incoming loan.
  - c. The COD System excludes any discharged amounts or payments to Servicing made within 120 days of disbursement from the calculation.
  - d. The COD System uses the gross amount `<DisbursementAmount>` for the actual disbursements reported for the loans selected.

## SUBMITTING DIRECT LOAN DISBURSEMENT INFORMATION AND DISBURSEMENT RELEASE INDICATOR

The COD System can accept Direct Loan Disbursement information in advance, on or after the Disbursement Date.

### Disbursement Date:

Schools must submit the Disbursement Date, not the transaction date, for adjusted disbursement amounts.

### BUSINESS RULES

1. The COD System accepts disbursement information in advance of, on or after the disbursement date.
2. The COD System will only accept an actual disbursement if an accepted MPN exists on the COD System linked to the associated Direct Loan award.
3. An individual Direct Loan award can have up to 20 disbursements (Numbers 01-20).
4. Disbursement Date is the date the money was credited to the student's account or paid to the student (or borrower, if PLUS loan) directly for a specific disbursement number. Disbursement Date is **not** the date of the adjustment transaction. The Disbursement Date is submitted on a Disbursement transaction as well as on an Adjusted Disbursement Amount transaction.

### 15 Day Reporting:

Schools must report disbursements within 15 days according to the regulations.

5. Disbursement information must be submitted in compliance with the 15-day reporting regulation.
  - a. All data necessary to book a loan or subsequent disbursement must be reported within 15 days of the actual disbursement date.
  - b. Adjustments to disbursement amounts should be reported within 15 days of the date the adjustment occurred, which may or may not be within 15 days of the actual disbursement date reported in the record.
6. Schools will receive Warning Edit 055 "Disbursement Information Received 30 Days or More After Date of Disbursement" in the following conditions;
  - a. Disbursement Sequence Number = 1, and
  - b. Disbursement Information received and processed more than 30 days later than the Disbursement Date reported on the record, and

- c. Disbursement Release Indicator = true

While Warning Edit 055 looks at actual disbursement records submitted more than 30 days after the actual Date of Disbursement, regulations require schools to submit all actual disbursements to the Department within 15 days of the actual disbursement date.

- 7. Disbursement information is submitted to the COD System with a Disbursement Release Indicator equal to true or false.
  - a. A Disbursement Release Indicator = false (submit anticipated disbursement information). False indicates anticipated disbursement information and functions like an origination record.
  - b. A Disbursement Release Indicator = true. True indicates actual disbursement information.
  - c. If the Disbursement Release Indicator is omitted from the Common Record, the COD System sets it to false.
- 8. A Disbursement Release Indicator = false can be updated to true on a Direct Loan disbursement.
- 9. A Disbursement Release Indicator = true cannot be updated to false on a Direct Loan disbursement.
- 10. Disbursement Release Indicator can be updated and disbursements can be generated, updated and adjusted on the COD Website.

#### **Enrollment Status for Direct Loans:**

The Enrollment Status reported to COD for Direct Loans is generally the student's enrollment status as of the date the actual disbursement was made.

- 11. The required data elements for an anticipated Direct Loan disbursement are:
  - a. Disbursement Number, <Disbursement Number="">
  - b. Disbursement Amount (gross), <DisbursementAmount>
  - c. Disbursement Date, <DisbursementDate>
  - d. Disbursement Release Indicator set to false, <DisbursementReleaseIndicator = "false">
  - e. Disbursement Sequence Number, <DisbursementSequenceNumber>
  - f. Disbursement Net Amount, <DisbursementNetAmount>
  - g. Disbursement Fee Amount, <DisbursementFeeAmount>
  - h. Interest Rebate Amount, <InterestRebateAmount>

- i. Payment Period Start Date <PaymentPeriodStartDate>
- j. Payment Period End Date, <PaymentPeriodEndDate>
- k. Enrollment School Code <EnrollmentSchoolCode>
- l. Enrollment Status <EnrollmentStatus>
- m. CIP <CIP Number="">
- n. Program CIP Code <ProgramCIPCode>
- o. Published Program Length Years <PublishedPgmLengthYears>
- p. Published Program Length Months <PublishedPgmLengthMonths>
- q. Published Program Length Weeks <PublishedPgmLengthWeeks>
- r. Weeks Programs Academic Year <WeeksProgramsAcademicYear>
- s. Special Programs<SpecialPrograms>
- t. Program Credential Level <ProgramCredentialLevel>
- u. Program CIP Code Year <ProgramCIPCodeYear>

**Direct PLUS Loan Actual Disbursement:**

The COD System does not accept Direct PLUS Loan disbursements with a Disbursement Release Indicator = true without an approved credit decision on file.

12. The required data elements for Direct Loan actual disbursement are:

- a. Disbursement Number, <Disbursement Number="">
- b. Disbursement Amount (gross), <DisbursementAmount>
- c. Disbursement Date, <DisbursementDate>
- d. Disbursement Release Indicator set to true, <DisbursementReleaseIndicator="true">

- e. Disbursement Sequence Number, <DisbursementSequenceNumber>
- f. Disbursement Net Amount, <DisbursementNetAmount>
- g. Disbursement Fee Amount, <DisbursementFeeAmount>
- h. Interest Rebate Amount, <InterestRebateAmount>
- i. Payment Period Start Date <PaymentPeriodStartDate>
- j. Payment Period End Date <PaymentPeriodStartDate>
- k. Enrollment School Code <EnrollmentSchoolCode>
- l. Enrollment Status <EnrollmentStatus>
- m. CIP <CIP Number="">
- n. Program CIP Code <ProgramCIPCode>
- o. Published Program Length Years <PublishedPgmLengthYears>
- p. Published Program Length Months <PublishedPgmLengthMonths>
- q. Published Program Length Weeks <PublishedPgmLengthWeeks>
- r. Weeks Programs Academic Year <WeeksProgramsAcademicYear>
- s. Special Programs <SpecialPrograms>
- t. Program Credential Level <ProgramCredentialLevel>
- u. Program CIP Code Year <ProgramCIPCodeYear>

13. The calculation to determine whether or not to increase the CFL is driven by:

- a. Disbursement Date,
- b. Disbursement Release Indicator set to true, and
- c. Acceptance of an actual disbursement.

14. Schools participating in **Advance Funded** can submit a Disbursement Release Indicator = true up to seven (7) calendar days prior to the disbursement date.
- a. When the current date is seven (7) calendar days or less prior to the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts the actual disbursement if the MPN is accepted for that loan. The COD System will not accept a PLUS actual disbursement without an approved credit decision on file.
    - i. The CFL calculation is performed and uses the actual disbursement to determine if the CFL needs to be increased once the promissory note is on file.
    - ii. When the actual disbursement is accepted prior to the disbursement date and the promissory note is on file, the actual disbursement is booked on the disbursement date and passed to Servicing.
  - b. When the current date exceeds seven (7) calendar days prior to the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with Edit 051.
15. Schools placed in **Cash Monitoring 1** (HCM1) review status by the School Participation Team (SPT) can submit a Disbursement Release Indicator = true up to seven (7) calendar days prior to the disbursement date.

#### Identifying Disbursement Dates:

For schools participating in HCM1, the Pending Disbursement List report can assist in identifying estimated disbursements and their disbursement dates.

- a. When the current date is seven (7) calendar days or less prior to the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System will accept the actual disbursement if the MPN is accepted for that loan. If the MPN is not accepted, the actual disbursement is rejected. In addition, the COD System does not accept a PLUS actual disbursement without an approved credit decision on file.
    - i. The CFL calculation is performed and uses the actual disbursement to determine if the CFL needs to be increased.
    - ii. When the actual disbursement is accepted prior to the disbursement date, the actual disbursement is booked on the disbursement date and passed to Servicing.
  - b. When the current date is more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with Edit 051.
16. Schools placed in **Reimbursement** or **Cash Monitoring 2** (HCM2) review status by the School Participation Team can submit a Disbursement Release Indicator = true if the current date is equal to or after the Disbursement Date.

**Payment Analyst:**

The Payment Analyst is formerly referred to as Reimbursement Analyst.

- a. If the current date is equal to or after the Disbursement Date and the Disbursement Release Indicator is set to true the disbursement is reviewed and may be approved by FSA.
  - i. The disbursement status will display as 'Review' on the COD Website.
  - ii. Schools will not receive a common record response until the disbursements have been reviewed and approved or rejected by the Payment Analyst.
  - iii. CFL is increased based upon approvals by the School Participation Team. Reimbursement and Cash Monitoring 2 schools do not receive a CFL until the COD System accepts and posts actual disbursements.
  - iv. The Payment Analyst creates a drawdown request for Pell, Direct Loan, and TEACH.
  - v. Reimbursement and HCM2 schools are required to have an accepted origination record and accepted MPN before COD will accept actual disbursements.
- b. When Direct Loan Schools are placed on Cash Monitoring 2 (HCM2) or Reimbursement, COD will automatically reduce the CFL to be equal to the sum of the Net Accepted and Posted Disbursement or Net Drawdowns (whichever is greater) for all open award years.

## REPORTING PENNIES IN THE AWARD AND DISBURSEMENT AMOUNT DATA ELEMENTS

The Award and Disbursement Amounts on the Common Record may include pennies. In the Direct Loan Program, pennies are not processed or stored by the COD System. All Direct Loan reported amounts that include partial dollar amounts will be truncated. Including pennies in Direct Loan disbursement records could make reconciliation efforts more difficult.

### BUSINESS RULES

1. The data elements for Award and Disbursement Amounts on the Common Record may include two digits to the right of a decimal point.
2. The Direct Loan Program does **not** process or store award and disbursement amounts using pennies.
3. Pennies that are reported in the award and disbursement amount data elements will be truncated by the COD System. The COD System does **not** round to the nearest dollar when truncating reported amounts. For example, a reported amount of \$2625.67 is truncated to \$2625.
4. The award and disbursement amount data elements are:

- a. Award Amount, <FinancialAwardAmount>
- b. Award Amount Requested, <FinancialAwardAmountRequested>
- c. Disbursement Amount (gross), <DisbursementAmount>
- d. Disbursement Fee Amount, <DisbursementFeeAmount>
- e. Interest Rebate Amount, <InterestRebateAmount>
- f. Disbursement Net Amount, <DisbursementNetAmount>

## CALCULATING DIRECT LOAN DISBURSEMENTS

There are no changes to disbursement calculations and rounding logic for the 2024-25 Award Year.

The next two sections discuss these calculations and provide examples. This first section discusses Disbursement Amount (Gross) Calculations. The next section discusses Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations.

### BUSINESS RULES

1. The current method to calculate individual Disbursement Amounts (Gross) and the current rounding logic have not changed since the implementation of COD. The variance is still applied to the last disbursement. See *Disbursement Amount (Gross) Calculations* below for steps and examples.
2. Schools submit the Disbursement Amount (gross), Disbursement Fee Amount, Interest Rebate Amount and Disbursement Net Amount to the COD System for disbursements.
3. The method to calculate the Disbursement Net Amount and Disbursement Fee Amount and Interest Rebate Amount is a six-step process. See the next section *Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations* for the calculations and examples.
4. Origination fees are determined based on the Earliest Disbursement Date (actual disbursements take precedence over anticipated disbursements). For a table of the new origination fees please refer to the *Origination Fees Periods and Percentage Table* in the *Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations* topic.
5. A system generated response will be sent to the reporting school of a student where Origination Fee, Interest Rebate Percentage and Disbursement Net, Fee and Rebate Amounts have been changed using the new message class CROFYYP.



## Disbursement Amount (Gross) Calculations

When determining disbursement amounts (gross) for a loan, dollar figures are rounded to the nearest dollar and all disbursements are equal with the exception of the last disbursement, in some cases. This is due to any variance being applied to the last disbursement.

When computing gross disbursement amounts, use the following specifications:

**Step 1: Individual disbursement amount is Award Amount divided by the total number of disbursements.**

If necessary, truncate any positions that exist past 2 decimal places.

**Step 2: Round the individual disbursement amount. Rounding occurs at the 1st and 2nd decimal places to the nearest dollar.**

If the 1st and 2nd decimal places are 50 or greater, increase the 1st digit to the left of the decimal sign by one. If the 1st and 2nd decimal places are less than 50, do not change the 1st digit to the left of the decimal sign.

**Step 3: To determine the amount of the last disbursement, multiply the individual disbursement amount by the number of disbursements.**

If the sum of the disbursements is greater than the Loan Amount Approved, subtract the difference from the last disbursement. If the sum of the disbursements is less than the Loan Amount Approved, add the difference to the last disbursement.

The variance is applied to the last disbursement.

**Example 1: Determining Gross Disbursement Amounts for Two Disbursements** Suppose a student has an award of \$3425.00, distributed across two disbursements.

**Step 1: Divide the award amount by the number of disbursements.**

$$\$3425.00 \div 2 = \$1712.50$$

**Step 2:** Round at the 1st and 2nd decimal places to determine the individual disbursement amount.

Since the 1st and 2nd decimal places (of \$1712.50) exceed 50, increase the first digit to the left of the decimal (the 2) by one.

$$\$1712.50 \text{ is rounded to the nearest dollar, which is } \$1713.$$

**Step 3:** To determine the last disbursement amount, multiply the individual disbursement amount by the number of disbursements.

$$\$1713 \times 2 = \$3426$$

Since \$3426 is more than \$3425, subtract the difference of \$1 from the value of the disbursement, which was determined in step 2. The last disbursement is equal to \$1713 - \$1 or \$1712.

Final Results:

1st Disbursement Amount (gross)	\$1713.00
2nd Gross Disbursement Amount (gross)	\$1712.00
Total Award Amount	\$3425.00

#### Example 2: Determining Gross Disbursement Amounts for Three Disbursements

Suppose a student has an award of \$1000.00, distributed across three disbursements.

##### **Step 1: Divide the award amount by the number of disbursements.**

$$\$1000.00 \div 3 = \$333.3333$$

Truncate any positions that exist past the 2nd digit to the right of the decimal.

$$\$333.3333 \text{ truncates to } \$333.33$$

##### **Step 2: Round at the 1st and 2nd decimal places to determine the individual disbursement amount. Since the 1st and 2nd decimal places (of \$333.33) does not exceed 50, truncate all decimal places.**

$$\$333.33 \text{ is rounded to the nearest dollar, which is } \$333.$$

The gross disbursement amount for all disbursements (except the last disbursement) is \$333.

##### **Step 3: To determine the last disbursement amount, multiply the individual disbursement amount by the number of disbursements.**

$$\$333 \times 3 = \$999$$

Since \$999 is less than \$1000, add the difference of \$1 from the value of the disbursement, which was determined in step 2. The last disbursement is equal to \$333 + \$1 or \$334.

Final Results:

1st Gross Disbursement Amount	\$333.00
2nd Gross Disbursement Amount	\$333.00
3rd Gross Disbursement Amount	\$334.00
Total Award Amount	\$1000.00

## Example 3: Determining Gross Disbursement Amounts for Six Disbursements

Suppose a student has an award of \$22,167.00, distributed across six disbursements.

**Step 1: Divide the award amount by the number of disbursements.**

$$\$22,167.00 \div 6 = \$3,694.500$$

Round to two decimal places by truncating any positions that exist past the 2nd digit to the right of the decimal.

$$\$3,694.500 \text{ truncates to } \$3,694.50$$

**Step 2: Round at the 1st and 2nd decimal places to determine the individual disbursement amount.**

Since the 1st and 2nd decimal places (of \$3,694.50) is 50, truncate all decimal places and round the first digit to the left of the decimal up by one.

$$\$3,694.50 \text{ is rounded to the nearest dollar, which is } \$3,695.$$

The gross disbursement amount for all disbursements (except the last disbursement) is \$3,695.

**Step 3: To determine the last disbursement amount, multiply the individual disbursement amount by the number of disbursements.**

$$\$3,695 \times 6 = \$22,170$$

Since \$22,170 is greater than \$22,167, subtract the difference of \$3 from the value of the disbursement, which was determined in step 2. The last disbursement is equal to \$3,695 - \$3 or \$3,692.

Final Results:

1st Gross Disbursement Amount	\$3695.00
2nd Gross Disbursement Amount	\$3695.00
3rd Gross Disbursement Amount	\$3695.00
4th Gross Disbursement Amount	\$3695.00
5th Gross Disbursement Amount	\$3695.00
6th Gross Disbursement Amount	\$3692.00
Total Award Amount	\$22,167.00

## ORIGINATION FEE CALCULATION

### Loan Origination Fee Change:

The COD System will not allow you to change the Origination Fee Percent on an active loan. If a school needs to change the Origination Fee, they must first inactivate the loan by reducing the award and disbursement amounts to \$0.

### Origination Fee Percent for Subsidized and Unsubsidized Direct Loans

For Subsidized and Unsubsidized Direct Loan originations, the COD System uses the Disbursement Date on the earliest dated actual disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent, regardless of the award year. If no actual disbursements are submitted, the system will use the Disbursement Date of the earliest dated anticipated disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent was submitted, regardless of the award year. Actual disbursements (DRI = true) will always take precedence over anticipated disbursements (DRI = false) when determining the Earliest Disbursement Date. The Origination Fee Percent will vary depending on the Origination Fee Period in which the earliest Disbursement Date falls.

- If a loan is submitted with an Earliest Disbursement Date prior to July 1, 2007, the corresponding Origination Fee Percent must be 3%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2007 and before July 1, 2008, the corresponding Origination Fee Percent must be 2.5%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2008 and before July 1, 2009, the corresponding Origination Fee Percent must be 2%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2009 and before July 1, 2010, the corresponding Origination Fee Percent must be 1.5%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2010 and before July 1, 2013, the corresponding Origination Fee Percent must be 1%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2013 and before December 1, 2013, the corresponding Origination Fee Percent must be 1.051%.
- If a loan is submitted with an Earliest Disbursement Date on or after December 1, 2013 and before October 1, 2014, the corresponding origination fee must be 1.072%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2014 and before October 1, 2015, the corresponding origination fee must be 1.073%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2015 and before October 1, 2016, the corresponding origination fee must be 1.068%.

- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2016 and before October 1, 2017, the corresponding origination fee must be 1.069%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2017 and before October 1, 2018, the corresponding origination fee must be 1.066%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2018 and before October 1, 2019, the corresponding origination fee must be 1.062%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2019 and before October 1, 2020, the corresponding origination fee must be 1.059%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2020 and before October 1, 2025, the corresponding origination fee must be 1.057%.

#### Origination Fees Periods and Percentage Table

Earliest Disbursement Date Range	Fee %
Prior to 06/30/2007	3.0
07/01/2007 and 06/30/2008	2.5
07/01/2008 and 06/30/2009	2.0
07/01/2009 and 06/30/2010	1.5
07/01/2010 and 06/30/2013	1.0
07/01/2013 and 11/30/2013	1.051
12/01/2013 and 09/30/2014	1.072
10/01/2014 and 09/30/2015	1.073
10/01/2015 and 09/30/2016	1.068
10/01/2016 and 09/30/2017	1.069
10/01/2017 and 09/30/2018	1.066
10/01/2018 and 09/30/2019	1.062
10/01/2019 and 09/30/2020	1.059
10/01/2020 and 09/30/2025	1.057

Table 21

For new award originations, the COD System will return an award level reject edit if the Origination Fee Percent is not consistent with the Origination Fee Period in which the Earliest Disbursement Date falls.

## ORIGINATION FEE PERCENTAGE FOR PLUS DIRECT LOANS

For Direct PLUS Loan originations, the COD System uses the Disbursement Date on the earliest dated actual disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent, regardless of the award year. If no actual disbursements are submitted, the system will use the Disbursement Date of the earliest dated anticipated disbursement, regardless of disbursement number, to confirm the appropriate Origination Fee Percent was submitted, regardless of the award year. Actual disbursements (DRI = true) will always take precedence over anticipated disbursements (DRI = false) when determining the Earliest Disbursement Date. The Origination Fee Percent will vary depending on the Origination Fee Period in which the earliest Disbursement Date falls.

- If a loan is submitted with an Earliest Disbursement Date prior to July 1, 2013 the corresponding Origination Fee Percent must be 4%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2013 and before December 1, 2013, the corresponding Origination Fee Percent must be 4.204%.
- If a loan is submitted with an Earliest Disbursement Date on or after December 1, 2013 and before October 1, 2014, the corresponding Origination Fee Percent must be 4.288%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2014 and before October 1, 2015, the corresponding Origination Fee Percent must be 4.292%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2015 and before October 1, 2016, the corresponding Origination Fee Percent must be 4.272%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2016 and before October 1, 2017, the corresponding Origination Fee Percent must be 4.276%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2017 and before October 1, 2018, the corresponding Origination Fee Percent must be 4.264%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2018 and before October 1, 2019, the corresponding Origination Fee Percent must be 4.248%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2019 and before October 1, 2020, the corresponding Origination Fee Percent must be 4.236%.
- If a loan is submitted with an Earliest Disbursement Date on or after October 1, 2020 and before October 1, 2025, the corresponding Origination Fee Percent must be 4.228%.

**Origination Fees Periods and Percentage Table**

Earliest Disbursement Date Range	Fee %
Prior to 07/01/2013	4.0
07/01/2013 and 11/30/2013	4.204
12/01/2013 and 09/30/2014	4.288
10/01/2014 and 09/30/2015	4.292
10/01/2015 and 09/30/2016	4.272
10/01/2016 and 9/30/2017	4.276
10/01/2017 and 9/30/2018	4.264
10/01/2018 and 9/30/2019	4.248
10/01/2019 and 9/30/2020	4.236
10/01/2020 and 9/30/2025	4.228

Table 22

**HOW TO SUBMIT CHANGES TO ORIGINATION FEE PERCENTAGES**

To submit changes to the origination fee percentage, a school should complete the following actions:

For Direct Loan awards with only anticipated disbursements.

**Option 1 –**

Step 1: Reduce the award amount and disbursements to \$0 to inactivate the original award. Wait for an accepted acknowledgement.

Step 2: *Reactivate the original award* by submitting all of the following information:

- A change to the origination fee amount and the origination fee percentage that corresponds to the origination fee percentage period;
- change to the earliest disbursement date that corresponds to the origination fee percentage period; and
- An updated award amount and the appropriate disbursement amount(s).

**Option 2 –**

Step 1: Reduce the award amount and disbursements to \$0 to inactivate the original award.

Wait for an accepted acknowledgement.

Step 2: *Submit a new award* that includes all of the following information:

- The origination fee amount and an origination fee percentage that corresponds to the origination fee percentage period;
- An earliest disbursement date that corresponds to the origination fee percentage period; and
- The award amount and appropriate disbursement amount(s).

**NOTE:** For Direct PLUS Loans, if the credit check on file is more than 180 days in the past, a new credit check will be completed when the new award is processed. In addition, if the Direct PLUS Loan has an endorser, the borrower will need to complete a new Master Promissory Note and the endorser will need to complete a new Endorser Addendum.

For Direct Loan awards with at least one actual disbursement.

#### Option 1 –

Step 1: Reduce the disbursement amount(s) to \$0 to inactivate the disbursement(s). Wait for an accepted acknowledgement.

Step 2: Reduce the award amount to \$0 to inactivate the original award. Wait for an accepted acknowledgement.

Step 3: Submit a change to the origination fee percentage and a change to the earliest disbursement date that corresponds to the origination fee percentage period.

Wait for an accepted acknowledgement.

Step 4: *Reactivate the original award* by submitting an updated award amount and the appropriate disbursement amount(s).

#### Option 2 –

Step 1: Reduce the disbursement amount(s) to \$0 to inactivate the disbursement(s). Wait for an accepted acknowledgement.

Step 2: Reduce the award amount to \$0 to inactivate the original award.

Wait for an accepted acknowledgement.

Step 3: *Submit a new award* that includes all of the following information:

- The origination fee amount and an origination fee percentage that corresponds to the origination fee percentage period;
- An earliest disbursement date that corresponds to the origination fee percentage period; and
- The award amount and appropriate disbursement amount(s).



**NOTE:** For Direct PLUS Loans, if the credit check on file is more than 180 days in the past, a new credit check will be completed when the new award is processed. In addition, if the Direct PLUS Loan has an endorser, the borrower will need to complete a new Master Promissory Note and the endorser will need to complete a new Endorser Addendum.

## COD REJECT EDIT 213

COD Reject Edit 213 (Actual Disbursement Submitted with EDD after an established date) will be returned when a school submits an actual disbursement (Disbursement Release Indicator (DRI) equals true) and the earliest disbursement date (EDD) on the award is on or after an established date (see the Note below). The disbursement-level edit will be applied to all Direct Loan award types and across all active award years.

Awards with an EDD on or after the established date and that only contain anticipated disbursements (DRI equals false) will be accepted with origination fees effective for the prior period.

**Note:** The established date will be determined by Federal Student Aid when changes to origination fees are expected and the new fees are unknown. We will inform the community of the established date through an Electronic Announcement when it is determined. At the time the new fees are known, reject Edit 213 will no longer be triggered. As an example, the established date for the next origination fee change is October 1, 2018. If a Direct Loan award with an actual disbursement is submitted to the COD System and the EDD is on or after October 1, 2018, the award will be rejected with COD Reject Edit 213.

## INTEREST REBATE CALCULATION

### INTEREST REBATE PERCENT FOR SUBSIDIZED AND UNSUBSIDIZED DIRECT LOANS

For Subsidized and Unsubsidized Direct Loan originations, the COD System uses the Disbursement Date on the earliest dated actual disbursement, regardless of disbursement number, to confirm the appropriate Interest Rebate Percent, regardless of the award year. If no actual disbursements are submitted, the system will use the Disbursement Date of the earliest dated anticipated disbursement, regardless of disbursement number, to confirm the appropriate Interest Rebate Percent was submitted, regardless of the award year. Actual disbursements (DRI = true) will always take precedence over anticipated disbursements (DRI = false) when determining the Earliest Disbursement Date. The Interest Rebate Percent will vary depending on the Interest Rebate Period in which the earliest Disbursement Date falls.

- If a loan is submitted with an Earliest Disbursement Date prior to July 1, 2009, the corresponding Interest Rebate Percent must be 1.5%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2009 and before July 1, 2010, the corresponding Interest Rebate Percent must be 1.0%.
- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2010 and before 7/1/2012, the corresponding Interest Rebate Percent must be 0.5%.

- If a loan is submitted with an Earliest Disbursement Date on or after July 1, 2012, the corresponding Interest Rebate Percent must be 0%.

**Interest Rebate Periods and Percentage Table**

Earliest Disbursement Date Range	Rebate
Prior to 06/30/2009	1.5
07/01/2009 to 06/30/2010	1.0
07/01/2010 to 06/30/2012	0.5
07/01/2012 and forward	0

Table 23

For new award originations, the COD System will return an award level reject edit if the Interest Rebate Percentage is not consistent with the Interest Rebate Period in which the Earliest Disbursement Date falls.

## Interest REBATE PERCENT FOR PLUS DIRECT LOANS

The interest rebate percent for PLUS loans is 1.5% for loans submitted with an Earliest Disbursement Date before 7/1/2012. For loans submitted with an Earliest Disbursement Date on or after 7/1/2012, the Interest Rebate Percentage will be processed as 0% for all DL awards including Sub, Unsub and PLUS.

## DISBURSEMENT NET AMOUNT, DISBURSEMENT FEE AMOUNT, AND INTEREST REBATE AMOUNT CALCULATIONS

A 6-step calculation is used to derive the Disbursement Net Amount, Disbursement Fee Amount and Interest Rebate Amount. This process allows a school to start the calculation with either the gross disbursement amount or the net disbursement amount and end with the same results.

## BUSINESS RULES

The following business rules apply to all Direct Loan types:

1. An up-front interest rebate amount is calculated at the disbursement level by the schools for each Subsidized, Unsubsidized, and PLUS loan.
2. The Combined Fee/Interest Rebate is a field used to assist in the calculation of the net disbursement amount. This field is for the calculation only and is NOT a field sent to the COD System.
3. When calculating the Combined Fee/Interest Rebate Amount and the Loan Fee Amount, take all results out three (3) decimal places to ensure consistent results and then truncate.

4. When determining the Combined Fee/Interest Rebate Amount, Disbursement Fee Amount, and the Interest Rebate Amount truncate the result by removing the cents from the whole dollar amount. Do not round to the nearest dollar when truncating.
5. Beginning in July 2012, the Interest Rebate Percentage is 0% for all Direct Loan awards including Unsubsidized, Subsidized and PLUS. This will apply to all DL awards with the Earliest Disbursement Date on or after 7/1/2012.
6. When calculating the individual Disbursement Fee Amount, Interest Rebate Amount, and Disbursement Net Amount, use the following specifications for all disbursements:

***To calculate Net Disbursement Amount***

Step 1: Combined Fee/Interest Rebate Amount (go out to 3 decimal places) = Disbursement Amount (Gross) x (Origination Fee Percent – Interest Rebate Percent)

Step 2: Truncate the Combined Fee/Interest Rebate Amount

Step 3: Disbursement Net Amount = Disbursement Amount (gross) – Combined Fee/Interest Rebate Amount

***To calculate Loan Fee Amount***

Step 4: Disbursement Fee Amount (go out to 3 decimal places) = Disbursement Amount (gross) x Origination Fee Percent  
Step 5: Truncate the Disbursement Fee Amount

To calculate Interest Rebate Amount

Step 6: Interest Rebate Amount = Disbursement Net Amount – (Disbursement Amount (gross) – Disbursement Fee Amount)

To calculate from Disbursement Net Amount to Disbursement Amount (gross) use the following calculation: Disbursement Net Amount multiplied by 100 divided by 100 minus (Fee% - Rebate%), or

For PLUS loans, Disbursement Net Amount divided by .95796 = Disbursement Amount (gross) (rounded) Then proceed with Step 4.

***To calculate Gross Disbursement Amount using the Net Disbursement Amount***

Step 1: Determine the Origination Fee Percentage (go out 3 decimal places) and the Interest Rebate Percentage (go out 2 decimal places)

Step 2: Gross Amount = Net Amount divided by (1 minus the Origination Fee Percentage + Interest Rebate Percentage)

## Example 1a – DL Sub/Unsub Origination with three disbursements

Suppose the Disbursement Date of the earliest disbursement is 2012-09-30. The origination fee percent will be 1.0%, Interest Rebate fee will be 0%. The combined fee/interest rebate amount, disbursement net amount, disbursement fee amount, and interest rebate amount for each disbursement will be calculated as follows:

—		Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Disb. Number	Gross Disb. Amount	Combined Fee/Interest Rebate Amount	Truncated Combined Fee/Interest Rebate Amount	Disb. Net Amount	Disb. Fee Amount	Truncated Disb. Fee Amount	Interest Rebate Amount
1	\$1167	$1167 \times (.010 - .000) = 11.67$	11	$1167 - 11 = 1156$	$1167 \times .010 = 11.67$	11	$1156 - (1167 - 11) = 0$
2	\$1167	$1167 \times (.010 - .00) = 11.67$	11	$1167 - 11 = 1156$	$1167 \times .010 = 11.67$	11	$1156 - (1167 - 11) = 0$
3	\$1166	$1166 \times (.010 - .000) = 11.66$	11	$1166 - 11 = 1155$	$1166 \times .010 = 11.66$	11	$1155 - (1166 - 11) = 0$
Totals	\$3500	—	—	\$3467	—	33	0

Table 24

An em dash or “—” indicates no data.

## Example 1b – DL PLUS Origination with three disbursements

Suppose the Disbursement Date of the earliest disbursement is 2012-6-30. The origination fee will be 4.0%. The combined fee/interest rebate amount, disbursement net amount, disbursement fee amount, and interest rebate amount for each disbursement will be calculated as follows:

—		Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Disb. Number	Gross Disb. Amount	Combined Fee/Interest Rebate Amount	Truncated Combined Fee/Interest Rebate Amount	Disb. Net Amount	Disb. Fee Amount	Truncated Disb. Fee Amount	Interest Rebate Amount
1	\$1167	$1167 \times (.04 - .015) = 29.175$	29	$1167 - 29 = 1138$	$1167 \times .04 = 46.68$	46	$1138 - (1167 - 46) = 17$
2	\$1167	$1167 \times (.04 - .015) = 29.175$	29	$1167 - 29 = 1138$	$1167 \times .04 = 46.68$	46	$1138 - (1167 - 46) = 17$
3	\$1166	$1166 \times (.04 - .015) = 29.150$	29	$1166 - 29 = 1137$	$1166 \times .04 = 46.64$	46	$1137 - (1166 - 46) = 17$
Totals	\$3500	—	—	\$3413	—	138	51

Table 25

An em dash or “—” indicates no data.

## Example 2: DL Sub Origination with twelve disbursements

Suppose the Disbursement Date of the earliest disbursement is 2012-06-30. The origination fee percent will be 1.0%, Interest Rebate fee will be 0.5%. The combined fee/interest rebate amount, disbursement net amount, disbursement fee amount, and interest rebate amount for each disbursement will be calculated as follows:

—		Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Disb. Number	Gross Disb. Amount	Combined Fee/Interest Rebate Amount	Truncated Combined Fee/Interest Rebate Amount	Disb. Net Amount	Disb. Fee Amount	Truncated Disb. Fee Amount	Interest Rebate Amount
1	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
2	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
3	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
4	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
5	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
6	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
7	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
8	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
9	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
10	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
11	\$319	$319 \times (.010 - .005) = 1.595$	1	$319 - 1 = 318$	$319 \times .010 = 3.19$	3	$318 - (319 - 2) = 1$
12	\$316	$316 \times (.010 - .005) = 1.58$	1	$316 - 1 = 315$	$316 \times .010 = 3.16$	3	$315 - (316 - 2) = 1$
Totals	\$3825	—	—	\$3813	—	36	12

Table 26

An em dash or "—" indicates no data.

## UPDATING ACADEMIC YEAR AND FINANCIAL AWARD BEGIN AND END DATES

It is critically important that schools accurately report academic year dates and loan period start and end dates for all types of Direct Loans (Direct Subsidized, Direct Unsubsidized, and Direct PLUS) to COD. It is equally important that schools update a loan's previously reported loan period dates if the borrower's actual attendance during the loan period is different from the anticipated attendance that was the basis for the school's initial reporting to COD. COD will reject an Academic Year where the date range does not meet the minimum regulatory requirements for academic year length with reject edit 046. Refer to the Federal Student Aid Handbook for additional information.

The following are some of the reasons that would require a school to update a student's loan period:

- The borrower requests that a disbursement that is attributable to an entire payment period be cancelled.
- The borrower does not begin attendance or does not begin attendance on at least a half-time basis, in a payment period that was included in the originally reported loan period and the school did not make any disbursements of the loan for that payment period.
- The school determines that the borrower is not eligible to receive a Direct Loan for a payment period that was part of the originally reported loan period.
- The borrower withdraws during a payment period that was included in the originally reported loan period and, as a result, the entire amount of the disbursement that was intended for that payment period is returned under the Return to Title IV aid calculation (R2T4); or
- For clock-hour programs, non-term credit hour programs, and certain types of non-standard term credit-hour programs, the borrower fails to progress to the next payment period or academic year as scheduled.

In most cases, the Academic Year dates will not need to be updated. Academic year dates should only be updated under specific circumstances for example:

- Original dates were inaccurately reported.
- The student is attending during the summer term and receiving a loan.
- For clock-hour programs, non-term credit hour programs, and certain types of non-standard term credit-hour programs, the borrower fails to progress to the next payment period or academic year as scheduled.

## BUSINESS RULES FOR UPDATING ACADEMIC YEAR AND FINANCIAL AWARD BEGIN AND END DATES

1. To update Loan Period dates the following data elements are required:
  - a. Financial Award Begin Date <FinancialAwardBeginDate>
  - b. Financial Award End Date <FinancialAwardEndDate>

2. To update Academic Year dates the following data elements are required:

- a. Academic Year Begin Date <AcademicYearBeginDate>
- b. Academic Year End Date <AcademicYearEndDate>

**Note:** If you are zeroing out an unused disbursement, you may also need to shorten the loan period. This may be done in the same transaction.

## UPDATING AND ADJUSTING DIRECT LOAN DISBURSEMENT AMOUNTS AND DATES

While Disbursement Release Indicator is set to false, the Anticipated Disbursement Amounts and Dates can be updated. Once the Disbursement Release Indicator = true, the Actual Disbursement Amount and Dates can be adjusted.

### BUSINESS RULES FOR UPDATING DISBURSEMENTS

1. Disbursement Amount and Disbursement Date can be updated prior to a Disbursement Release Indicator = true.

A disbursement is updated when a change is made and the Disbursement Release Indicator is false.

2. To update a Disbursement Amount and/or Disbursement Date, the following data elements are required:

- a. Disbursement Release Indicator = false, <DisbursementReleaseIndicator = "false">
- b. Disbursement Number, <Disbursement Number= "">
- c. Disbursement Sequence Number of "1", <DisbursementSequenceNumber>
- d. Disbursement Amount (gross), <DisbursementAmount>
- e. Disbursement Net Amount, <DisbursementNetAmount>
- f. Disbursement Fee Amount, <DisbursementFeeAmount>
- g. Interest Rebate Amount, <InterestRebateAmount>
- h. Disbursement Date, <DisbursementDate>

In September 2014, Edit 50 was modified to allow schools to submit disbursement date changes on a zeroed out disbursement to be outside of the loan period dates.

## BUSINESS RULES FOR ADJUSTING DISBURSEMENTS

A disbursement is adjusted when a change is made and the Disbursement Release Indicator is true.

1. Once a disbursement transaction with a Disbursement Sequence Number of "1" is accepted with a Disbursement Release Indicator = true, all Disbursement data elements can be adjusted.
2. An upward Disbursement Amount adjustment should occur on the Disbursement Date only if the additional funds are disbursed on that same date.
3. All Disbursement data elements can be adjusted in the same Disbursement complex element.
4. A disbursement transaction to adjust a Disbursement data element must have a unique Disbursement Sequence Number.
5. Disbursement Sequence Numbers for a specific Disbursement Number must be used in incremental, sequential order within the range of 1-65.
6. To determine the previous Sequence Number, a specific Disbursement Number is returned on all disbursement responses with Disbursement Sequence Number greater than 1 and can be used to determine the next Disbursement Sequence Number.
7. Disbursement Date is always the date the cash was credited to the student's account (according to Federal regulations) or paid to the student (or parent, if PLUS loan) directly for a specific disbursement number.

### Transaction Date Not Submitted

Schools must submit the Disbursement Date, not the transaction date for adjusted disbursement amounts. See Example below.

8. Direct Loan disbursement amounts can be adjusted to \$0.
9. To adjust a Disbursement, the following data elements are always required:
  - a. Disbursement Release Indicator = true, <DisbursementReleaseIndicator = "true">
  - b. Disbursement Number, <Disbursement Number= "">
  - c. New Disbursement Sequence Number, <DisbursementSequenceNumber>
  - d. New Disbursement Amount (gross), <DisbursementAmount>
  - e. Disbursement Date, <DisbursementDate>
  - f. New Disbursement Net Amount, <DisbursementNetAmount>



- g. New Disbursement Fee Amount, <DisbursementFeeAmount>
- h. New Interest Rebate Amount, <InterestRebateAmount>

10. The following Disbursement data elements are required only when updating the value:

- a. Payment Period Start Date
- b. Enrollment School Code
- c. Enrollment Status
- d. CIP Code

#### Example

When submitting an adjusted disbursement amount for an actual disbursement on the Common Record, the Disbursement Date (i.e. the date the school disburses the funds to the student) is reported. The transaction date (i.e. the date the school processes the adjusted disbursement amount) is not submitted

A school disburses the first disbursement of a loan to a student for \$2000 on 9/10/2014. The school discovers that the disbursement amount needs to be corrected to \$1000.

On 9/15/2014, the school adjusts the disbursement amount to \$1000. The school then discovers that the student needs the full original loan amount.

On 9/20/2014, the school disburses a second disbursement to the student for \$1000. The school does NOT upwardly adjust the first disbursement since the additional funds were disbursed on a different date. The actual disbursement transaction and adjusted disbursement transaction must be submitted on the Common Record as follows:

—	Disbursement Release Indicator	Disb #	Disb Sequence #	Disbursement Date	Disb Amount (gross)	Fee Amount	Interest Rebate Amount	Net Disb Amount
Actual Disbursement	true	1	1	09-10-2014	2000	20	0	1980
Adjusted Disbursement	true	1	2	09-10-2014*	1000	10	0	990
Actual Disbursement	true	2	1	09-20-2014	1000	10	0	990

Table 27  
An em dash or “—” indicates no data.

\* Do **not** submit the transaction date of 09-15-2014 on the Adjusted Disbursement.

## DISBURSEMENT REQUIREMENTS FOR AWARD AMOUNT UPDATES

The anticipated and actual disbursement amounts that exist for the award determine whether a change to the Award Amount is accepted or rejected by the COD System. Anticipated disbursement information may be recalculated by the COD System when the school submits a change to the Direct Loan Award Amount on an existing award.

### BUSINESS RULES

1. The COD System compares the changed Award Amount to the sum of the actual disbursements (Disbursement Release Indicator = true) and the sum of the anticipated disbursements (Disbursement Release Indicator = false) to determine if the change to the Award Amount should be rejected or accepted.
2. A change to the Award Amount is accepted if the new Award Amount is greater than or equal to the sum of the actual disbursements.
3. A change to the Award Amount is rejected if the new Award Amount is less than the sum of the actual disbursements. The change to the Award Amount rejects with error code 041. (Edit 041 is only returned if the Disbursement Release Indicator = true on the change record).
4. If a new Award Amount is less than the sum of the anticipated disbursements and the sum of the actual disbursements is equal to \$0, the COD System recalculates the anticipated disbursements until the sum of the anticipated disbursements is equal to the new Award Amount. Edit 118 informs the school that the anticipated disbursements have been recalculated.
  - a. The COD System recalculates the anticipated disbursements by first reducing the last anticipated disbursement (highest disbursement number) and then reducing each of the previous disbursement amounts as needed. *Please see Example 1.*
  - b. The COD System does not recalculate the anticipated disbursements when the school submits both a reduction to the Award Amount and adjustments to the anticipated disbursements in the same submission to the COD System.

Please refer to the Inactivating a Direct Loan topic for more information on loan inactivation.

5. If the Award Amount is reduced to \$0 and the sum of the actual disbursements is equal to \$0, all anticipated disbursements are reduced to \$0 to allow loan inactivation. Warning edit 119 is returned in the Response document to inform schools that all anticipated disbursements have been reduced to \$0.
6. If an accepted Award Amount is less than the original Award Amount, but greater than the sum of the anticipated disbursements, the anticipated disbursements are not recalculated by the COD System. *Please see example 2.*

Please refer to the Calculating Direct Loan Disbursements and the Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amount Calculations topics for more information about Direct Loan calculations performed by the COD System.

7. When COD recalculates an anticipated disbursement, the Disbursement Net Amount, Disbursement Fee Amount, and Interest Rebate Amounts are also recalculated.

8. The COD System returns zero in the actual and anticipated disbursement data elements in the Direct Loan Rebuild file for an award with a Disbursement Release Indicator = true and the sums of the actual and anticipated disbursements equal zero. These data elements contain zero in both the origination and disbursement segments of the file.

#### Example 1

The award amount changes from \$6000 to \$1500 on an award with no actual disbursements on file. The anticipated disbursements are recalculated as follows:

Disbursement Number	Previous Anticipated Disbursement Amount	New Anticipated Disbursement Amount
1	\$2000	\$1500
2	\$2000	\$0
3	\$2000	\$0

Table 28

Schools may need to redistribute the disbursement amounts in order to adhere to multiple disbursement and substantially equal disbursement regulations.

The award amount changes from \$6000 to \$3000 on an award with no actual disbursements on file. The anticipated disbursements are recalculated as follows:

Disbursement Number	Previous Anticipated Disbursement Amount	New Anticipated Disbursement Amount
1	\$2000	\$2000
2	\$2000	\$1000
3	\$2000	\$0

Table 29

#### Example 2

The award amount changes from \$6000 to \$8000 on an award with no actual disbursements on file. The anticipated disbursements are not recalculated since the sum of the anticipated disbursements is less than the new award amount.

Disbursement Number	Previous Anticipated Disbursement Amount	New Anticipated Disbursement Amount
1	\$2000	\$2000
2	\$2000	\$2000
3	\$2000	\$2000

Table 30

## INACTIVATING A DIRECT LOAN

To inactivate a Direct Loan, update the Award Amount to \$0 and reduce actual disbursements to \$0.

### BUSINESS RULES

1. The Award Amount and actual disbursements must be reduced to \$0 to inactivate a loan.
2. All activity can be generated and submitted in the same Common Record.
3. If the Award Amount is reduced to \$0 and the sum of the actual disbursements is equal to \$0, the COD System automatically reduces all anticipated disbursements to \$0 to allow loan inactivation. Warning edit 119 is returned in the Response document to inform schools that all anticipated disbursements for the award have been reduced to \$0. *Please see Example 1.*
4. A funded loan may be inactivated for a number of reasons. Examples include: A borrower returns all of the disbursed funds to the school within 120 calendar days of disbursement, or the school returns the money to comply with Federal Regulations. Gross, fees, interest and rebate are adjusted accordingly.
5. Schools must always return funds to COD via G5 or the electronic refund process.

#### Example 1

The award amount changes from \$6000 to \$0 on an award with no actual disbursements on file. The COD System reduces all anticipated disbursements to zero and inactivates the loan.

Disbursement Number	Previous Anticipated Disbursement Amount	New Anticipated Disbursement Amount
1	\$2000	\$0
2	\$2000	\$0
3	\$2000	\$0

Table 31

## GENERATING DIRECT LOAN BOOKING NOTIFICATION RESPONSES

The COD System generates a Booking Notification Response when the loan books with the initial disbursement. Subsequent Booking Notifications are NOT sent for each subsequent funded disbursement.

### BUSINESS RULES

1. A loan books when all of the following exists on the COD System:

a. Accepted Award

When the Response Code is equal to “Accepted” and the Disbursement Release Indicator is false, the Common Record Response indicates an accepted Award or in the case of Direct Loan accepted loan.

b. Accepted Actual Disbursement that is greater than \$0 and has a disbursement date equal or prior to the current date.

When the Response Code is equal to “Accepted” and the Disbursement Release Indicator is true, the Common Record Response indicates an accepted actual Disbursement.

c. Accepted MPN

All schools are required to have an accepted MPN on the COD System before actual disbursements can be accepted for the associated Direct Loan award.

d. Accepted Credit Decision for a PLUS loan.

When the Credit Decision Status tag `<CreditDecisionStatus>` indicates a status of “A”, it is indicating an accepted credit decision for the PLUS Loan.

2. Two tags on the Common Record assist a school in determining if an MPN is accepted.

a. The MPN Status Code `<MPNStatusCode>` indicating a status of “A” (Accepted) OR

b. The MPN Link Indicator `<MPNLinkIndicator>` indicating a status of “true,” record has been linked to an MPN.

3. When a loan books, the COD System generates a Booking Notification Response to the school.

4. A COD system-generated Booking Notification Response contains a Document Type of BN. The Document Type indicates the type of Response.

5. A Response Document of Document Type BN contains a system-generated Document ID.

6. A Booking Notification Response contains the following data elements in the Response Complex Element `<Response>`:

a. Booked Amount, `<BookedAmount>`

b. Booked Date, `<BookedDate>`

c. Document Type, `<DocumentTypeCode>`

d. Processing Date, `<ProcessDate>`

7. Booked Amount is the total net amount of the first disbursement accepted and booked by COD for the award.
8. The Booking Notification allows a school to update their system with the Booked Status of a loan to assist with the Direct Loan reconciliation process.

## GENERATING PAYMENT TO SERVICER RESPONSES

When a student or parent makes a payment to a Servicer within 120 calendar days of the disbursement date, the COD System generates a Payment to Servicer Response that is sent to a school. This transaction should be considered when determining the borrower's eligibility for a subsequent loan.

### BUSINESS RULES

1. A Payment to Servicer transaction is generated by the COD System and sent to a school when a borrower makes a payment to a Servicer within 120 calendar days of the disbursement date.
2. A Payment to Servicer transaction should NOT update the disbursed amount for the loan. This transaction is for informational purposes only and should be considered when determining the borrower's eligibility for future loans.
3. The COD System will not send Payment to Servicer responses to schools containing PLUS loan data. COD will send Payment to Servicer responses to schools containing data for Subsidized and Unsubsidized loans only.
4. The following data elements are returned in addition to the Response complex element:
  - a. Award Year, <FinancialAwardYear>
  - b. Award ID, <FinancialAwardID>
  - c. Disbursement Number, <Disbursement Number ="">
  - d. Disbursement Sequence Number, <DisbursementSequenceNumber>
5. Disbursement Sequence Numbers on a Payment to Servicer Response are in descending, sequential order starting with 99 to 91.
6. The Payment to Servicer Response contains the <PreviousSequenceNumber> tag indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.
7. The Payment to Servicer Amount is reported as a dollar value with a negative sign.
  - a. If a previous Payment to Servicer Amount or partial amount needs to be reversed a positive dollar value is sent with the next descending sequential disbursement sequence number.

8. A COD system-generated Payment to Servicer Response contains a Document Type of PS. The Document Type indicates the type of Response.
9. A Response Document of Document Type PS contains a system-generated Document ID.
10. A Payment to Servicer Response contains the following data elements in the Response complex element <Response>:
  - a. Payment to Servicer Amount, <PaymentToServicerAmount>
  - b. Payment to Servicer Date, <PaymentToServicerDate>
  - c. Document Type, <DocumentTypeCode>
  - d. Processing Date, <ProcessDate>
  - e. Previous Sequence Number, <PreviousSequenceNumber> For all data elements refer to the sample on the next page.

#### Example

A school receives a Payment to Servicer transaction for \$500 on a fully disbursed \$3500 loan for a first year student. The school's system should continue to store the borrower's loan as \$3500.

However, if the first year student decides to later request an additional loan for \$500 for the same academic year, the \$500 Payment to Service would be taken into consideration by the school when determining the student's eligibility to borrow an additional \$500 loan.

If the student is eligible to borrow the additional \$500 loan, the school's system should display two loans for this first-year student:

Student Grade Level	Academic Year	Disbursed Loan Amount	Payment to Servicer
1	09/02/2014 to 06/20/2015	\$3500	\$500
1	09/02/2014 to 06/20/2015	\$500	—

Table 32  
An em dash or “—” indicates no data.

Annual Loan Limit for 1st Year = \$3500

Total Disbursed for Academic Year = \$4000

Payment to Servicer = \$500

## LOAN DISCHARGE

A loan may be discharged for several reasons, some of which are: if the borrower is declared bankrupt, becomes totally and permanently disabled, dies, if the loan was the result of an unauthorized signature or payment or if the borrower is a victim of Identity Theft - False Certification. The Servicer notifies COD of the change in the loan and/or borrower's condition and of the effective date of the loan discharge or pending discharge.

The discharge date is the date the Servicer received notification of the discharge such as unauthorized signature/payment, bankruptcy, o disability, or the date of the borrower's death.

### **BUSINESS RULES SPECIFIC TO CLOSED SCHOOL, FALSE CERTIFICATION – ABILITY TO BENEFIT, TOTAL AND PERMANENT DISABILITY, FALSE CERTIFICATION – DISQUALIFYING STATUS, TEACHER FORGIVENESS, BORROWER DEFENSE, UNPAID REFUND, AND BANKRUPTCY**

1. The COD System continues to process all disbursement activity for loans originated prior to and after the discharge date.
2. All MPNs are unaffected by the discharge.

### **BUSINESS RULES SPECIFIC TO DEATH**

1. Upon receipt of a discharge notification due to death, the COD System performs the following functions:
  - a. Inactivates all MPNs for the borrower. MPNs will remain linked to loans dated prior to the discharge date but cannot be linked to new loans.
  - b. Updates the MPN Expiration Date for all discharged MPNs to be equal to the date of the loan discharge, unless the MPN Expiration Date precedes the discharge date. If the MPN Expiration Date is updated due to discharge, schools will receive an unsolicited promissory note response with the updated MPN Expiration Date for their information.
  - c. Rejects the following disbursements with Edit 095:
    - i. New actual disbursements submitted after the discharge date where the disbursement date is after the discharge date.
    - ii. New anticipated disbursements submitted after the discharge date where the disbursement date is after the discharge date.
    - iii. Upward actual disbursement adjustments submitted after the discharge date where the disbursement date is also after the discharge date.
    - iv. Actual Disbursement adjustments to an anticipated disbursement submitted after the discharge date where the disbursement date is after the discharge date.
  - d. Rejects all loan originations submitted after the discharge date with Edit 092.



**BUSINESS RULES SPECIFIC TO UNAUTHORIZED SIGNATURE/PAYMENT AND IDENTITY THEFT - FALSE CERTIFICATION:**

1. Upon receipt of a discharge notification for an unauthorized signature/payment, the COD System performs the following functions:
  - a. Inactivates only the MPN for the loan with an unauthorized signature/payment.
  - b. Updates the MPN Expiration Date for the MPN associated with the discharge to equal the date of the loan discharge, unless the MPN Expiration Date precedes the discharge date. If the MPN Expiration Date is updated due to discharge, schools will receive an unsolicited promissory note response with the updated MPN Expiration Date for their information.
  - c. Rejects the following disbursements for the affected award with Edit 094:
    - i. New actual disbursements submitted after the discharge date where the disbursement date is after the discharge date.
    - ii. New anticipated disbursements submitted after the discharge date where the disbursement date is after the discharge date.
    - iii. Upward actual disbursement adjustments submitted after the discharge date where the disbursement date is also after the discharge date.
    - iv. Actual disbursement adjustments to an anticipated disbursement submitted after the discharge date where the disbursement date is after the discharge date.
2. A borrower is eligible for future Direct Loan aid.
3. The amount of the affected award is NOT applied toward the student's annual loan limit.

**Impact of Loan Discharges on MPN, New Disbursements, and Originations**

Discharge Type	Discharge Reason	Count discharge amount toward the student's annual loan limit	Inactivate MPN	New Disbursements and Upward Adjustments on already originated loans	New Origination
D	C = Closed School	No	No	Accept	Accept
D	D = Death	No	Yes - ALL MPNs for borrower	Reject – All Awards	Reject – ALL
D	F = False Certification - Ability to Benefit	No	No	Accept	Accept
D	G = Unauthorized Signature/ Unauthorized Payment	No	Yes - Only for MPN linked to loan being discharged	Reject - Just disbursements for the loan being discharged	Accept
D	H = Disability	Yes	No	Accept	Accept
D	I = False Certification – Identity Theft	No	Yes – Only for MPN linked to loan being discharged	Reject – Just disbursements for the loan being discharged	Accept
D	M = False Certification - Disqualifying Status	No	No	Accept	Accept
D	T = Teacher Forgiveness	No	No	Accept	Accept
D	U = Unpaid Refund	No	No	Accept	Accept
D	B = Borrower Defense	No	No	Accept	Accept
D	R = Disaster Relief	No	No	Accept	Accept
D	X = Bankruptcy	No	No	Accept	Accept
P	X = Bankruptcy	Not Processed	Not Processed	Not Processed	Not Processed

Table 33

## MASTER PROMISSORY NOTES

The Master Promissory Note (MPN) is the approved promissory note for Direct Subsidized, Unsubsidized and PLUS Loans for both parent borrowers and graduate and professional student borrowers for all schools.

**Note:** PLUS loans for graduate and professional student borrowers are referred to as Grad PLUS.

### BUSINESS RULES FOR ALL MPNS

1. The MPN is a legal document requiring a student/borrower to repay the funds borrowed under the Direct Loan Program.
2. No dollar amount is printed on the MPN by the school or COD.
3. The COD System will process paper and electronic MPNs for all loan types.
4. An MPN must be signed by the borrower before disbursing a Direct Loan (Subsidized, Unsubsidized or PLUS [parent and graduate student]).
5. An open MPN is valid for up to ten years from the date the MPN is received by the COD System provided that at least one actual disbursement is made within a year from the date COD received it. Otherwise, it will expire after 1 year from the date it is received.
6. Once an MPN is closed or expires, no new loans can be linked to it. A new MPN must be generated if new loan awards are created. However, all disbursements and booking activities for the loans already linked to the closed or expired MPN continue to be processed by the COD System.

Please refer to the topic entitled “Closing MPNs” for more information.

### BUSINESS RULES SPECIFIC TO PLUS MPN

1. The PLUS MPN is to be used for PLUS processing.
2. The PLUS MPN is for one or more PLUS loans that one parent borrows for one student, or one graduate student borrows for his or herself.
3. The parent or graduate student borrower can have multiple PLUS MPNs on the COD System. The parent's MPNs may be for the same or for different students for the same or subsequent academic years. *Please see Example 1 below.*
4. A student can have multiple parents borrow PLUS loans for the same or subsequent academic years. *Please see Example 2 below.*
5. The student associated on a PLUS loan cannot be the endorser for that same PLUS award.
6. The PLUS MPN has a borrower type indicator at the top that must be completed. If “I am a Graduate/Professional Student” is checked, Section C: Dependent Undergraduate Student Information will be blank.

7. Once a PLUS borrower signs a PLUS MPN, the borrower authorizes the COD System to perform an initial credit check and future credit checks for awards made under that MPN, without requiring subsequent authorization. Thus, multiple credit decisions can be associated with one MPN.
8. The Borrower's Rights and Responsibilities have been incorporated into the PLUS MPN and is no longer a separate document.

#### Example 1: Parent borrower with multiple MPNs for multiple students

Parent James Smith has two students (Jack and Jill) attending school during the same Award Year (2019-20). James Smith signs a PLUS MPN for student Jack Smith for 2019-20 and signs a separate PLUS MPN for student Jill Smith for 2019-20.

#### Example 2: Student with multiple MPNs for multiple parent borrowers

Student Jack is attending school and multiple parents are helping to fund his education. Jack's father, James Smith, borrows a PLUS loan and signs an individual PLUS MPN for Jack Smith. In addition, Jack's stepfather, Robert Jones, borrows a PLUS loan for Jack and signs a separate PLUS MPN. Thus, there are two MPNs on the COD System associated with Jack for the same Award Year, 2019-20, for different parent borrowers.

## MASTER PROMISSORY NOTE FEATURES

All MPNs are processed using the multi-year (MY), single-year (SY), or, in the case of certain PLUS and Grad PLUS loans, single-loan (SL) feature. Each feature is discussed in more detail below.

The multi-year/single-year features of the MPN apply to the school and not to the MPN itself. An example would be that an MPN submitted by a single-year school and with the Academic Year Dates of 8/21/2012 – 4/10/2013 may link to an award submitted by a multi-year school and with the Academic Year Dates of 9/21/2013– 5/30/2014.

## MULTI-YEAR MPN FEATURE

Unless a school is specifically informed otherwise, all US Direct Loan schools may allow their student borrowers (Subsidized/Unsubsidized /Grad PLUS) and their parent borrowers (PLUS) to receive loans for subsequent academic years based upon a previously signed MPN. Foreign schools are not eligible for this option.

### BUSINESS RULES

1. The MY feature applies to all loan types. (Subsidized, Unsubsidized, and PLUS [parent and graduate student borrower]).
2. The MY feature has been expanded to include Direct Loan schools that are not four-year colleges or graduate or professional schools.
3. Schools that used the single-year feature in the previous award year will be identified in the COD System as using the single-year feature of the

MPN for the purpose of linking loans for the current award year if they do not inform COD School Relations of their desire to use the multi-year feature of the MPN.

4. New schools to the Direct Loan program that are eligible for the MY feature under the expanded authority for multi-year use of the MPN will be defaulted to use the MY feature in the COD System.
5. Multiple loans for a borrower are linked to the same MPN across schools and academic years.
  - a. Multiple Subsidized and Unsubsidized loans for a borrower are linked to the same MPN across schools and academic years.
  - b. Multiple PLUS loans for a borrower are linked to the same PLUS MPN across schools and academic years.
  - c. Multiple Grad PLUS loans for a borrower are linked to the same PLUS MPN across schools and academic years.
6. A school using the MY feature can use any MPN accepted by the COD System (even if that MPN was signed before the effective date of the expanded authority for multi-year use of the MPN).
7. Schools using the MY feature must have a confirmation process in place.
8. The COD System allows schools eligible for the MY feature to opt between the MY feature and the SY feature.

## SCHOOLS OPTING FOR SINGLE-YEAR MPN FEATURE

Schools eligible for the Multi-Year (MY) feature may choose to use the Single-Year (SY) feature of the MPN.

### BUSINESS RULES

1. When a school opts to process MPNs using the MY or SY feature, the feature selected applies to all Direct Loans processed by the school (Subsidized, Unsubsidized and PLUS [parent and graduate student borrower] loans).
  - a. All loans are processed using the SY feature OR all loans are processed using the MY feature.
2. If an eligible school opts to change the SY/MY feature, the change applies only to MPNs received at COD after the change is processed on the COD System.
3. Awards received after the date the option is changed link to an MPN using the newly selected option.
4. Schools must contact COD School Relations to change their SY/MY feature.

## SINGLE-YEAR MPN FEATURE

The single-year (SY) MPN feature requires that a new MPN be completed by a borrower for each academic year. All schools NOT eligible to process MPNs using the MY feature must use the SY feature. Schools eligible for the MY feature may opt to process MPNs using the SY feature as discussed in the previous section.

**PNote Option:**

All Foreign Schools are defaulted to be Single-Year Schools.

### BUSINESS RULES

1. The SY feature of the MPN is available to all schools.
2. All schools NOT eligible to process MPNs using the MY feature must use the SY feature. Therefore, the COD System does not allow these schools to change this processing feature.
3. Under SY feature a new MPN must be generated each academic year for each student.
4. A SY school must use an MPN generated at or for that school only.
5. A SY school can link multiple loans for the same academic year, for the same borrower, to the same MPN.
6. The academic year start and end dates must be the same on all loan records from the single year school linked to a specific MPN under the SY feature.
7. When a school eligible for the MY feature opts to use the SY feature, the school must update its option on the COD Website.

## SINGLE-LOAN MPN FEATURE (PLUS AND GRAD PLUS ONLY)

The single-loan (SL) MPN is an MPN linked to a PLUS or Grad PLUS loan that is accepted with an Endorser with an approved credit decision. Once an Endorser is associated with a PLUS or Grad PLUS loan, the MPN linked to that PLUS or Grad PLUS loan cannot be linked to any other loans even if the school processes MPNs using the MY feature.

### BUSINESS RULES

1. An MPN for a PLUS or Grad PLUS loan becomes an SL MPN under the following conditions:
  - a. An endorser is obtained because the borrower has received an adverse credit decision,

- b. The award receives an approved credit decision for the endorser, AND
  - c. The award is linked to the PLUS MPN.
- 2. When a PLUS or Grad PLUS Loan with an Endorser is linked to an MPN, the COD System returns an MPN Status of Inactive on the Response. However, this MPN is flagged by the COD System as a Single Loan (SL MPN) so that no further loans can be linked to this note.
- 3. Once an SL MPN is established, it becomes an inactive MPN and no other awards will be linked to that same MPN.
- 4. Once an SL MPN is established, all other pending and active PLUS MPNs for the borrower become inactive, including the SL MPN.
- 5. When a PLUS or Grad PLUS loan with an endorser is linked to an MPN, the MPN Status displayed on any future ISIRs will be Inactive.
- 6. If the borrower wants to borrow a subsequent PLUS or Grad PLUS loan a new MPN must be generated and signed.

## ELECTRONIC MASTER PROMISSORY NOTES (E-MPN)

Schools can choose whether to use the e-MPN for their borrowers.

### BUSINESS RULES

- 1. All participating Direct Loan schools are set to e-MPN Participant by default. Schools who do not wish to participate in the e-MPN process can change their e-MPN Participant designation from "Y" to "N" on the School Options Update page in COD.
  - a. Schools can control when their students may sign an MPN for their school by updating the Loan Origination Required (LOR) designation on the School Options Update page in COD.
- 2. If a school uses the e-MPN, there is no need to print a paper version of the MPN unless a borrower specifically asks for one.
  - a. If a borrower wants to sign a paper MPN, that option must be available to them.
  - b. If a borrower requests a paper MPN, blank MPN forms are available for download and printing from [DLMPNsandComms.pdf](#) (ed.gov)
- 3. The Direct Loan Program has an e-MPN available for both Subsidized/Unsubsidized (Stafford) and PLUS loans.
- 4. When borrowers complete an e-MPN, a Promissory Note Response is sent to the school the borrower selected while completing the e- MPN.

## MASTER PROMISSORY NOTE PRINTING PROCESS

The Master Promissory Note (MPN) printing process is the responsibility of the school. The COD System no longer prints paper MPNs and the COD MPN Print school option is no longer available on COD Web. Schools who don't wish to print MPNs have the following options:

1. Use electronic process available on StudentAid.gov.
2. Print a paper copy from COD Web. A fresh copy must be printed each time from the Website to ensure the alignment is appropriate for processing. Don't make copies of the printed version.

## BUSINESS RULES

1. Obtaining a signed MPN is the responsibility of the school.
  - a. All Direct Loan schools are set to participate in the eMPN process by default. Schools who do not wish to participate in the eMPN process can change their eMPN Participation designation from "Y" to "N" on the School Options Update page in COD.
  - b. The borrower can complete an electronic MPN on StudentAid.gov or a paper MPN. However, borrowers must be allowed the option of signing a paper MPN.
    - i. When a borrower completes the eMPN process, a Promissory Note Response is sent to the appropriate school.
  - c. A PLUS borrower can complete an eMPN or a paper PLUS MPN for a PLUS Loan.
  - d. A Grad PLUS borrower can complete an eMPN or a paper PLUS MPN for a Grad PLUS loan.
2. When a school is responsible for the MPN printing process, the school can print the MPNs.
  - a. Completed MPNs must be mailed to the Promissory Note processing center.
  - b. All signed Promissory Notes must be listed on a signed manifest that is mailed to the Department of Education
  - c. MPNs sent via regular mail should be mailed to the following address:  
  
US Department of Education  
P.O. Box 1130  
Fairfax, VA 22033
  - d. MPNs sent via overnight, express, or certified mail should be mailed to the following address:  
  
U.S. Department of Education  
4050 Legato Road Fairfax, VA 22033



e. Submitting Test Documents

All documents and shipping packages submitted for testing should be clearly marked “For Testing Only”.

f. Upon receipt of MPNs, the notes are screened for completeness.

g. Incomplete or illegible MPNs are returned to the school for correction.

h. Accepted MPNs generate a Promissory Note Response to be sent to the school.

i. Schools creating their own paper MPN form instead of using Department created paper MPN forms must have them tested and approved first. Schools can submit paper MPNs for COD testing and review by sending them to:

US Department of Education  
P.O. Box 1130 Fairfax, VA 22033

3. The PLUS MPN for Parent PLUS and Grad PLUS awards contains language authorizing COD to perform an initial and subsequent credit checks for the PLUS and Grad PLUS borrower. Additional authorization is not required for subsequent credit checks.

For more details on this response process, refer to the topic entitled Generating an MPN Response.

4. A school does not print a dollar amount on the MPN.

5. An MPN ID is generated for each MPN and printed/displayed on the MPN. (See below for details of the Sub/Unsub and PLUS MPN ID).

## **BUSINESS RULES SPECIFIC TO CREATING THE SUBSIDIZED/UNSUBSIDIZED MPN ID**

1. The Subsidized/Unsubsidized MPN ID is 21-characters. A Subsidized/Unsubsidized MPN ID contains an ‘M’ in the 10th position. The components for the Subsidized/Unsubsidized MPN ID are:

a. Student’s Social Security Number: 000010001–999999998

b. MPN Indicator: M

c. Award Year: For the 2024-25 Award Year, this should equal 25.

When generating the MPN ID the COD System increments the award year in the MPN ID by one each year. For all MPN IDs created on StudentAid.gov after the implementation of the 2024-25 software, the award year in the MPN ID is 25.

d. Direct Loan School Code: X00000–X99999 where X = G or E.

The school code imbedded in the MPN ID continues to be the DL school code (G or E code) and does not use the Routing Number (Common School Identifier).

e. MPN Sequence Number: 001–999

2. The MPN ID is used by the COD System to identify which Subsidized/Unsubsidized awards are linked to an MPN.

**Example: Subsidized/Unsubsidized MPN ID**

An MPN ID for a subsidized/unsubsidized MPN may look like:

Social Security Number	Sub/Unsub MPN Indicator	Award Year	Direct Loan School Code	MPN Sequence Number
999999999	M	25	G12345	001

Table 34

**BUSINESS RULES SPECIFIC TO CREATING THE PLUS MPN ID**

1. The PLUS MPN ID is 21-characters. A PLUS MPN ID contains an 'N' in the 10th position. The components for the PLUS MPN ID are:

1. Student's Social Security Number: 000010001–999999998

2. MPN Indicator: N

3. Award Year: For the 2024-25 Award Year, this should equal 25.

i. When creating the MPN ID the COD System increments the award year in the MPN ID by one each year. For all MPN IDs created on StudentAid.gov after the implementation of the 2024-25 software, the award year in the MPN ID is 25.

4. Direct Loan School Code: X00000–X99999 where X = G or E.

The school code imbedded in the MPN ID continues to be the DL school code (G or E code) and does NOT use the Routing Number (Common School Identifier).

5. MPN Sequence Number: 001–999

2. The MPN ID is used by the COD System to identify which PLUS awards are linked to an MPN.

**Example: PLUS MPN ID**

An MPN ID for a PLUS MPN may look like:

Social Security Number	PLUS MPN Indicator	Award Year	Direct Loan School Code	MPN Sequence Number
999999999	N	26	G12345	001

Table 36

3. The MPN ID is used by the COD System to identify which PLUS awards are linked to an MPN.
4. When printing the PLUS MPN, the borrower type indicator must be completed under Section A: Borrower Information. The borrower type indicator is worded:

CHECK ONE – I am a:

- Graduate or Professional Student
- Parent of a Dependent Undergraduate Student

5. If Graduate or Professional Student is checked, the following is left blank:
  - a. Section C: Dependent Undergraduate Student Information, numbers 14, 15, and 16
  - b. Section A: Borrower Information, number 7
6. Schools printing Promissory Notes can either
  - a. Print using the appropriate approved form, or
  - b. Print all text including data and data labels using the same format and wording as the form provided by the Department of Education.

Schools printing all text must have the format sent to and approved by FSA. For more information on the approval process contact COD School Relations.

7. To obtain approved PLUS MPN forms contact FSA Pubs.
8. When printing Promissory Notes, it is recommended to use Courier, 10 point, 12 pitch font.
9. When mailing the MPN, a number 10 business window envelope is recommended.
10. The PLUS MPN print specifications are provided in Volume 6, Section 6 – Print Specifications and Forms

## LINKING AN MPN TO A DIRECT LOAN SUBSIDIZED/UNSUBSIDIZED GRAD PLUS OR PLUS AWARD

The COD System links Direct Loan Subsidized/Unsubsidized and PLUS (parent and graduate student borrower) awards to an active MPN for that Borrower.

### BUSINESS RULES

1. When linking an award to an MPN, if multiple valid MPNs exist for a student, the award is linked to the MPN with the greatest expiration date.
2. The COD displays the MPN expiration date to assist schools in determining if the borrower has an active MPN available on the COD System
3. The MPN Expiration Date displays for all MPNs for Subsidized/Unsubsidized awards, and for PLUS awards.
4. The COD System does not link an MPN to a loan if the loan amount and all actual and anticipated disbursements equal zero.
5. The COD System initiates an MPN linking process when an award amount on an unlinked award is increased from zero.

### BUSINESS RULES SPECIFIC TO LINKING THE SUBSIDIZED/UNSUBSIDIZED MPN

Schools should encourage students to list the same Person Identifier information (i.e. complete formal name) used to file the Free Application for Federal Student Aid (FAFSA®) on applications for all types of financial aid. An accepted award and valid MPN will not link if the Person Identifier information differs on the award and MPN. See EXAMPLE below.

1. The COD System links an accepted Subsidized/Unsubsidized award to a valid MPN using the following student data elements:
  - a. Current SSN, AND
  - b. Date of Birth, AND
  - c. First two characters of the first name OR the first two characters of the last name, if the first name is blank.
2. When a Subsidized/Unsubsidized Award is accepted and a valid MPN is already on file, the MPN and award are linked.
  - a. The MPN Status, MPN Link Indicator, MPN ID and Electronic MPN Indicator are generated on an Award Response.
3. When a Subsidized/Unsubsidized Award is accepted and no valid MPN is on file, the award is not linked and the MPN Status Code on the Award Response equals R (valid MPN not on file at COD).
4. When a Subsidized/Unsubsidized Award is NOT accepted and there is a valid MPN on file, the Award will not be linked to the MPN. The MPN Link Indicator of false and the appropriate MPN Status Code (P= Pending or R = Rejected) will be returned in the Award Response.
5. When an MPN is received and an accepted Subsidized/Unsubsidized award is already on file and not yet linked to an MPN, the MPN and the

award are linked.

- a. The MPN Status, MPN Link Indicator, MPN ID and Electronic MPN Indicator will be generated on an MPN Response for the Subsidized/Unsubsidized award.
6. When an MPN is received and no accepted Subsidized/Unsubsidized award is already on file, the MPN is not linked and an unsolicited Promissory Note Response is generated.
7. If a valid MPN is on file and an accepted Subsidized/Unsubsidized award does not link (MPN Status Code = P, Pending), the student identifier information on the award does not match the student identifier information on the MPN. See EXAMPLE below. Schools should compare the student identifier information listed on the award and MPN, and perform the following actions:
  - a. Update the student identifier information listed on the award origination via batch or web.
  - b. Inactivate the loan by reducing the award amount and all anticipated disbursements to zero (\$0.00). Originate a new award with student identifier information that matches that of the MPN.

#### Example

Student Robert Adams files a Free Application for Federal Student Aid (FAFSA®) using his given name. The student identifier information Robert lists on the FAFSA® is pulled from FPS to create a valid MPN. The student identifier information on the MPN is as follows:

```
<Student>
```

```
<Index>
```

```
<SSN>999931101</SSN>
```

```
<BirthDate>1987-04-15</BirthDate>
```

```
<LastName>ADAMS</LastName>
```

```
</Index>
```

```
<PersonIdentifiers>
```

```
<SSN>999931101</SSN>
```

```
</PersonIdentifiers>
```

```
<Birth>
```

```
<BirthDate>1987-04-15</BirthDate>
```

```
</Birth>

<Name>

  <FirstName>ROBERT</FirstName>

  <LastName>ADAMS</LastName>

</Name>

</Student>
```

Robert then applies for a loan using his common first name, Bob. The student identifier information on the award is as follows:

```
<Student>

  <Index>

    <SSN>999931101</SSN>

    <BirthDate>1987-04-15</BirthDate>

    <LastName>ADAMS</LastName>

  </Index>

  <PersonIdentifiers>

    <SSN>999931101</SSN>

  </PersonIdentifiers>

  <Birth>

    <BirthDate>1987-04-15</BirthDate>

  </Birth>

  <Name>

    <FirstName>BOB</FirstName>
```

<LastName>ADAMS</LastName>

</Name>

</Student>

The COD System attempts to match the student identifier information contained on the award with the student identifier information of a valid MPN on file at COD. Since the first two letters of the student's first name listed on the award do not match the first two letters of the student's first name listed on the MPN, the award and MPN do not link. The COD System is unable to find the appropriate MPN with which to link the award and returns the MPN Status Code of X (Pending) on the Award Response.

## BUSINESS RULES SPECIFIC TO LINKING THE PLUS MPN FOR PARENT AND GRADUATE STUDENT BORROWERS

1. The COD System links an accepted PLUS award to a valid MPN using the following borrower (parent) and student data elements. For Grad PLUS, the COD System links an accepted PLUS award to a valid MPN using the borrower (graduate student) and student data elements:

For Grad PLUS, the current SSN, Date of Birth, and First Name submitted for the student must match the values submitted for the borrower on the award. If there is not an exact match on any of the fields, the award will not be recognized as a Grad PLUS award and will not link to a Grad PLUS MPN.

- a. Current SSN,
  - b. Date of Birth, AND
  - c. First two characters of the first name OR the first two characters of the last name, if the first name is blank.
2. Regardless of whether the award is linked or not linked to an MPN, a PLUS Award Response is not sent to a school until a credit decision status (Accepted, Pending or Denied) is received.

For parent PLUS, schools should encourage both parents and students to list the same Person Identifier information (i.e. complete formal names) used to file the FAFSA® for a PLUS loan application. An accepted award and valid PLUS MPN does not link if either the borrower or student identifier information on the award differs from that on the PLUS MPN. See EXAMPLE below.

- a. If the credit decision for a PLUS award is pending or denied, the MPN Status on the Award Response equals R (Rejected MPN or valid MPN not on file at COD), even when there is a valid MPN.
  - b. If the credit decision for a PLUS award is accepted, the MPN Status on the Award Response is either 'MPN on file' or 'MPN not on file' depending on whether there is a valid MPN on file at COD.
3. When a PLUS Award with a positive credit decision is accepted and a valid PLUS MPN is already on file, the PLUS MPN and PLUS award are linked.

- a. The MPN Status, MPN Link Indicator, MPN ID and Electronic MPN Indicator are generated on an Award Response for the PLUS award.
4. When a PLUS Award with a positive credit decision is NOT accepted and a valid PLUS MPN is already on file, the PLUS MPN and PLUS Award are not linked.
  - a. The MPN Link Indicator of false and the appropriate MPN Status Code (P = Pending or R = Rejected) is returned in the Award Response
5. When a positive credit decision is received for an Endorser and an accepted award and accepted MPN (one that is not yet linked to any awards) is already on file, the award is linked to the PLUS MPN and the PLUS MPN becomes a Single-Loan MPN.

Please refer to the topic entitled “Single-Loan MPN” for more information.

- a. The PLUS MPN Status, MPN Link Indicator, MPN ID, Electronic MPN Indicator and Endorser Amount, if applicable, are sent to the school on a Credit Status Response and an unsolicited MPN Response is NOT generated.
6. When a PLUS MPN is received and an accepted award with a positive credit decision is already on file and not yet linked to an MPN, the PLUS MPN and the PLUS award are linked.
  - a. The MPN Status, MPN Link Indicator, MPN ID, and Electronic MPN Indicator are sent to the school on a MPN Response.
7. If a valid PLUS MPN already on file does not link to an accepted award with a positive credit decision, the student and/or borrower identifier information on the award does not match the student and/or borrower identifier information on the PLUS MPN. *Please see example below.* Schools should compare all Person Identifier information listed on the award and PLUS MPN, and perform the following actions:
  - a. Update the student and/or borrower identifier information listed on the award origination via batch or web.
  - b. Inactivate the loan by reducing the award amount and all anticipated disbursements to zero (\$0.00). Originate a new award with student identifier information that matches that of the MPN.

### Example

Parent William Adams decides to take out a PLUS loan for his son John. William and John file a FAFSA® and list William's given name. The borrower identifier information on the PLUS MPN is as follows:

<Borrower>

<Index>

<SSN>123456789</SSN>

<BirthDate>1953-05-19</BirthDate>



```
<LastName>ADAMS</LastName>

</Index>

<PersonIdentifiers>

  <SSN>123456789</SSN>

</PersonIdentifiers>

<Birth>

  <BirthDate>1953-05-19</BirthDate>

</Birth>

<Name>

  <FirstName>WILLIAM</FirstName>

  <LastName>ADAMS</LastName>

</Name>

</Borrower>
```

William then applies for a PLUS loan using his common first name, Bill. The borrower identifier information on the award is as follows:

```
<Student>

  <Index>

  </Index>

  <PersonIdentifiers>

  </PersonIdentifiers>

  <Birth>

  </Birth>
```

```
<Name>

</Name>

</Student>
```

The COD System attempts to match the borrower identifier information contained on the award with the borrower identifier information of a valid PLUS MPN on file at COD. Since the first two letters of the borrower's first name on the award do not match the first two letters of the borrower's first name listed on the PLUS MPN, the award and PLUS MPN do not link. The COD System is unable to find the appropriate PLUS MPN with which to link the award and returns the MPN Status Code of P (Pending) on the Award Response.

#### Example

Robert Smith decides to take out a Grad PLUS loan. Robert files a FAFSA® and lists his given name. The borrower identifier information on the PLUS MPN is as follows:

```
<Borrower>

  <Index>

    <SSN>123456789</SSN>

    <BirthDate>1953-05-19</BirthDate>

    <LastName>ADAMS</LastName>

  </Index>

  <PersonIdentifiers>

    <SSN>123456789</SSN>

  </PersonIdentifiers>

  <Birth>

    <BirthDate>1953-05-19</BirthDate>

  </Birth>

  <Name>
```

```
<FirstName>ROBERT</FirstName>  
  
<LastName>SMITH</LastName>  
  
</Name>  
  
</Borrower>
```

Robert then applies for a Grad PLUS loan using his common first name, Bob. The borrower identifier information on the award is as follows:

```
<Student>  
  
  <Index>  
  
    <SSN>123456789</SSN>  
  
    <BirthDate>1953-05-19</BirthDate>  
  
    <LastName>SMITH</LastName>  
  
  </Index>  
  
  <PersonIdentifiers>  
  
    <SSN>123456789</SSN>  
  
  </PersonIdentifiers>  
  
  <Birth>  
  
    <BirthDate>1953-05-19</BirthDate>  
  
  </Birth>  
  
  <Name>  
  
    <FirstName>BOB</FirstName>  
  
    <LastName>SMITH</LastName>  
  
  </Name>
```

&lt;/Student&gt;

The COD System attempts to match the Grad PLUS borrower identifier information contained on the award with the borrower identifier information of a valid PLUS MPN on file at COD. Since the first two letters of the borrower's first name on the award do not match the first two letters of the borrower's first name listed on the PLUS MPN, the award and PLUS MPN do not link. The COD System is unable to find the appropriate PLUS MPN with which to link the award and returns the MPN Status Code of P (Pending) on the Award Response.

## MULTI-YEAR (MY) FEATURE LINKING BUSINESS RULES

1. The MY feature allows multiple awards for different academic years from the same or different MY schools to link to the same MPN.
2. The COD System applies the MY feature only to schools eligible for the MY feature.
3. When the borrower has more than one MPN on file with the same expiration date, the COD System links incoming awards to the MPN with the latest received date by the COD System (when the receive dates are different).
4. The COD System links the award to the MPN only if the Award Begin Date on the award is prior to or equal to the MPN expiration date.
5. An inactive or closed MPN is no longer eligible for processing. This means no other awards can be linked to the MPN once it is inactive or closed.
  - a. The exception to this rule would be if an award is received with an Award Begin Date prior to the MPN expiration date and the award is NOT inactive due to a pending bankruptcy discharge or an unauthorized signature discharge. Then, the award will be linked to the MPN; however, the MPN remains inactive.

## SINGLE-YEAR (SY) FEATURE LINKING BUSINESS RULES

1. The SY feature allows one or more PLUS (parent and student borrower) awards with the same academic year from the same school to link to the same PLUS MPN.
2. PLUS (parent and student borrower) awards from the same school with different academic years may not be linked to the same PLUS MPN.
3. The SY feature allows one or more subsidized or unsubsidized awards with the same academic year from the same school to link to the same MPN.
4. Subsidized and Unsubsidized awards from the same school with different academic years may not be linked to the same MPN.
5. The COD System must match the Direct Loan School Code on the Award ID with the school code in the 21-character MPN ID.
6. For the purpose of linking, the COD System establishes the academic year period used for an MPN to be the academic year start and end dates of the first award linked to the MPN.

7. The COD System links subsequent awards to the MPN if the academic year start and end dates are the same as those of the first award linked to the MPN.

### **SINGLE-LOAN MPN LINKING BUSINESS RULES (FOR PLUS AND GRAD PLUS ONLY)**

1. A PLUS MPN becomes a single-loan MPN under the following conditions:
  - a. The PLUS MPN has no other awards linked to it.
  - b. An endorser is obtained because the borrower has received an adverse credit decision.
  - c. The award receives an approved credit decision for the endorser, and
  - d. The award is linked to the PLUS MPN.
2. Once a single-loan MPN is established, no other awards are linked to that same MPN.
3. The expiration date for a single-loan MPN is the date that the COD System assigns the single-loan flag to the MPN.
4. Once a single-loan MPN is established, all other pending and active PLUS MPNs for the borrower become inactive, including the SL MPN. Thus, if the borrower wants to borrow a subsequent PLUS or Grad PLUS loan a new MPN must be generated and signed.

Once a PLUS or a Grad PLUS award is linked to a single-loan MPN, the COD System must receive a new PLUS MPN and a new award, provided all other linking criteria are satisfied, in order to accept an increase to the amount the parent or student wants to borrow.

5. The COD System rejects with error code 113 any disbursements that exceed the endorser amount on the award linked to a single-loan MPN since the endorser is responsible for no more than the PLUS or Grad PLUS Loan amount on the Endorser Addendum.
6. On an award linked to a single-loan MPN, the Award Amount can be decreased.
7. The COD System sends to the PLUS or Grad PLUS borrower with a denied credit decision, an Endorser Addendum, and a new PLUS MPN unless a pending PLUS MPN is on file. (A pending MPN is one that is not yet linked to an award.)
8. If the borrower elects to have an endorser, a PLUS MPN is needed on file to link the award to once the endorser is approved. When the award is linked, the MPN becomes a single-loan MPN.
9. If the borrower elects to have an endorser, the award can be linked to the pending PLUS MPN once an approved endorser credit decision is received.

## GENERATING AN EXPIRATION DATE FOR AN MPN

The MPN expiration date calculation performed by the COD System for all MPNs is based on MPN expiration date regulations.

### BUSINESS RULES

1. For a pending MPN (one that does not yet have an award linked to it), the expiration date is calculated as the date the MPN is received by COD for processing plus one year.
2. For an MPN that has been linked but has no award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus one year.
3. For an MPN that has been linked and has at least one award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 10 years.
4. For an MPN associated with a discharged loan, the expiration date is calculated as the discharge date, unless the expiration date precedes the discharge date.
5. The MPN expiration date and the date an MPN is received by COD are viewable on the COD Website.
6. The COD System accepts a disbursement with a Disbursement Release Indicator = true for any award linked to an MPN even if the MPN has expired only when the following two conditions are met:
  - a. The award is already linked to the MPN, AND
  - b. The disbursement successfully passes all other disbursement edits for being accepted by the COD System.
7. The COD System accepts disbursements for any award already linked to an expired MPN provided the disbursement passes all other edits.
  - a. If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is on or before the MPN expiration date, the MPN expiration date is recalculated using the date the MPN was received at COD for processing plus 10 years and the MPN is reactivated (Accepted Status).
  - b. If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is after the MPN expiration date, the MPN expiration date remains unchanged and the MPN status remains inactive.
  - c. If an accepted subsequent disbursement is not the first actual disbursement under the MPN, the MPN expiration date remains unchanged and the MPN status stays the same.
8. The COD System sends unsolicited MPN Acknowledgements to all schools associated with the MPN each time the MPN Expiration Date changes. The MPN Acknowledgement will include the <MPNExpirationDate> tag. This applies for ALL award years.

**Note:** MPN Acknowledgements are not sent for discharge or discharge reversals.

## CLOSING MPNS

To close an MPN (Subsidized/Unsubsidized or PLUS) a borrower must send a written request to his/her servicer. If a school receives a written request from a borrower, the request should be sent to the COD School Relations Center. The borrower must put their request in writing.

## BUSINESS RULES

1. Upon receipt of a written request from the borrower:
  - a. COD Customer Service manually closes an MPN via the [COD Website](#).
  - b. When an MPN is closed, a confirmation letter is sent to the borrower.
2. No new awards can be linked to a closed MPN.
3. Awards that are already linked to a closed MPN can continue to use that MPN for the disbursement processing.
4. A closed MPN is reopened by the COD System only if the MPN was closed in error by COD.
5. An MPN that is reopened goes back to the MPN Status to which the note was assigned prior to being closed.

## GENERATING A MASTER PROMISSORY NOTE RESPONSE

A Master Promissory Note Response is generated by COD and sent to a school to provide the status of an MPN for Subsidized/Unsubsidized, Grad PLUS and PLUS loans.

1. The COD System sends MPN responses to all schools associated with an MPN. A school is associated with an MPN when it has a loan linked to that MPN and/or it is the school specified on the MPN.

MPN Responses also contain an MPN expiration date data element. The MPN expiration date will be transmitted in the `<MPNExpirationDate>` tag. This applies to ALL award years.

**BUSINESS RULES**

1. MPN Responses are sent to the Attended school.
2. MPN Acknowledgements won't be sent to a school under the following conditions:
  - a. The loan(s) from that school linked to the MPN has (have) been reduced to \$0.
  - b. The school has confirmed that it has completed processing (confirmed closeout) for the Direct Loan award year indicated on the MPN or in the loan record(s) from that school and the school has no award linked to that MPN in a year that is still "open."
  - c. FSA has confirmed that the school has completed processing (confirmed closeout for the school) for the Direct Loan award year indicated on the MPN or in the loan record(s) from that school and the school has no award linked to that MPN in a year that is still "open."
  - d. The date is beyond the established annual data submission deadline (closeout deadline) for the Direct Loan award year indicated on the MPN or in the loan record(s) from that school and the school isn't on Extended Processing and the school has no award linked to that MPN in a year that is still "open."
    - i. The established data submission deadline for Direct Loans is usually the last business day in July of the year following end of the award year.
3. Schools will receive MPN Responses when the conditions above don't exist and:
  - a. COD accepts an MPN and there are no existing awards.
  - b. COD accepts an MPN and at least one award exists. The award(s) and MPN link.
  - c. COD accepts an award and the MPN exists. The award and the MPN link.
    - i. The MPN Response is sent to the school where the award originated.
    - ii. In this case, an MPN Response will only be sent to all associated schools if the linking results in an MPN Expiration Date change.
  - d. The MPN Expiration Date changes due to:
    - i. The acceptance of an actual disbursement within a year of COD's receiving the MPN.
    - ii. COD is notified that a loan associated with the MPN has been discharged due to death, unauthorized signature/unauthorized payment, or identity theft.
  - e. The MPN Response will be sent to all schools associated with the MPN that have active awards (Award Amount and Disbursement Amounts > \$0) or were listed on the MPN.



- i. If the school specified on the MPN is the same as the school where an active award originated, the school will not receive a separate response.
  - ii. MPN responses sent to schools that do not have an award linked to their MPN, but the MPN is linked to an award from another school, will not receive the `<MPNLinkIndicator>` tag.
- f. Award (active or inactive) and MPN exist on COD System and are unlinked. The MPN and award are manually linked.
  - i. The MPN Response will be sent to the school where the award was originated.
  - ii. If the linking results in the expiration date of the MPN changing, all associated schools will receive an MPN Response.
- g. Award and MPN exists on COD System and are unlinked. MPN and award are linked through Standard Student Identification Method (SSIM).
  - i. SSIM is a weekly process in which COD links MPNs to Awards which may not have linked upon submission.
  - ii. The MPN Response will be sent to the school where the award was originated.
  - iii. If the linking results in the expiration date of the MPN changing, all associated schools will receive an MPN Response.
- h. When an MPN expiration date changes the COD System will send MPN Acknowledgement to all associated schools.
  - i. MPN Responses sent to schools that do not have an Award linked to their own MPN, but the MPN is linked to an award at a different school, will not receive the `<MPNLinkIndicator>` tag.
- 4. The COD System does not generate Responses when an MPN is manually unlinked from an award or an MPN is unlinked due to a re-link of an award. No Response will be sent for a newly unlinked MPN if the expiration date is changed from “MPN Promissory Note Date/Signed field (MPN Received Date) + 365” to “MPN Promissory Note Date/Signed field (Received Date) +365”.
- 5. A COD system generated MPN Response contains a Document Type of PN. The Document Type indicates the type of Response.
- 6. A Response Document of Document Type PN contains a system-generated Document ID.
- 7. An MPN Response contains the following data elements in the Response complex element `<Response>`:
  - a. Document Status, `<DocumentStatusCode>`
  - b. Document Type, `<DocumentTypeCode>`
  - c. Processing Date, `<ProcessDate>`

8. In addition, the following data elements are in the MPN Response:
  - a. Award ID, <AwardID>
  - b. MPN Status, <MPNStatusCode>
  - c. MPN Link Indicator, <MPNLinkIndicator>
  - d. MPN ID, <MPNID>
  - e. Electronic MPN Indicator <EMPNIndicator> is part of the Response if an electronic MPN is filed by the borrower.
  - f. MPN Expiration Date, <MPNExpirationDate>
9. A Pending MPN is an accepted MPN, which cannot yet be linked with a loan award record. (No accepted Origination record on file.)
10. An e-MPN Indicator = true on an MPN Response identifies that the MPN was completed electronically.

## Direct PLUS Loan Credit Check

Credit checks for a Direct PLUS Loan are initiated in the following ways:

1. Submission of a PLUS award to the COD System
2. Borrower completion of a Direct PLUS Loan Request using the StudentAid.gov Website
3. School initiated credit check using the COD Website

The <CreditRequirementsMet> field is displayed on the following COD Web pages:

1. All Common Record, PLUS Application, Web, and Credit Status Response Information
2. Credit Check Information
3. Award Information

### **BUSINESS RULES**

1. Credit Requirements Met must be 'Yes' ('True') before a school may disburse a Direct PLUS Loan.
2. If a credit check was performed on the applicant within 180 days of the date of the credit check trigger, COD does not perform a new credit check.
3. If a PLUS borrower's credit decision is denied due to an adverse credit history, the borrower may obtain an endorser who does not have an adverse credit history or appeal the credit decision by documenting extenuating circumstances. The borrower will also be required to complete PLUS Credit Counseling.
4. When a school submits a PLUS origination and the borrower's permanent address is outside the U.S. or U.S. territories, the COD System uses the borrower's temporary address to conduct the credit check, if an address within the U.S. or U.S. territories is provided.

## CREDIT DECISION APPEAL PROCESS

PLUS loan applicants may appeal an adverse credit decision by documenting extenuating circumstances.

The COD System will validate the student and borrower information provided during the quick credit check process against the FPS Applicant data. A warning message is returned if either the student or the borrower's data does not match. The student's information must match against the FPS applicant data in order to continue with the credit check.

### BUSINESS RULES

1. PLUS Applicants can initiate a credit appeal by:
  - a. Submitting a credit appeal on StudentAid.gov
  - b. Call the Federal Student Aid Information Center (FSAIC) at 1-800-433-3243
2. Credit decision appeals documentation may be submitted to the Student Loan Support Center in one of the following ways:
  - a. Replying to the initial contact email you receive from the representative assigned to process your appeal with your supporting documentation attached.
  - b. Fax documents to (877) 623-5082
  - c. Mail documents to  
US Department of Education  
Attn: Credit Appeals Team  
PO BOX 1854  
Monticello, KY 42633
  - d. Initiate a Chat session on the StudentAid.gov Website and upload documents.

## CREDIT STATUS RESPONSE

A Credit Status response will be sent under the following conditions:

1. When a borrower's initial credit decision is pending, and the credit decision changes to accepted or denied.
2. Credit Appeal status change when:

- a. A Credit Appeal is created for the declined credit decision.
  - b. A Credit Appeal is placed in Pending Status (In Process, Awaiting Documentation, or Documentation in Review).
  - c. A Credit Appeal is approved.
  - d. A Credit Appeal is denied.
  - e. A Credit Appeal is closed.
  - f. A Credit Check is initiated via COD Web.
3. Endorser Addendum is processed and:
    - a. Links to a declined PLUS award (Endorser Approved = 'true').
    - b. Accepted for a PLUS Loan Request with a denied credit decision.
    - c. Accepted for a PLUS Loan Request and also links to a PLUS Award linked to the same denied credit check.
    - d. The endorser amount is less than the award amount.
      - Edit 184 will also be returned. The school will not be allowed to disburse more than Endorsed Amount (Credit Action Status = 'L').
    - e. The endorser's credit decision is denied. The applicant may pursue a different endorser.
  4. The PLUS Credit Counseling is completed and the applicant has a denied credit decision.

## GENERATING CREDIT STATUS RESPONSES

A new system generated Credit Status response will be sent to schools when a PLUS borrower with a declined credit status successfully obtains an approved endorser, has an appeal due to extenuating circumstances approved, and/or completes PLUS Credit Counseling.

## BUSINESS RULES

1. If a PLUS borrower has a declined credit decision and wishes to receive a PLUS Loan, the borrower must obtain an approved endorser or successfully document extenuating circumstances AND complete PLUS Credit Counseling.

For more information regarding the business rules on generating a PLUS Application Acknowledgement, please reference the Direct PLUS Loan Request section earlier in the Implementation Guide.

2. A COD system generated Credit Status Response has a Document Type of 'CS'.
3. A Document Type CS has a system-generated Document ID.
4. A Credit Status Response will be sent under the following conditions:
  - a. Successful documentation of extenuating circumstances.
  - b. Receipt of an approved or denied endorser.
  - c. Completion of PLUS Credit Counseling.
5. A Credit Status Response contains the following data elements in the Response complex element <Response>:
  - a. Edit Process Result, <EditProcessResult> (only if Endorser Amount is less than Award Amount)
  - b. Endorser Amount, <EndorserAmount> (only if endorser exists on loan)
  - c. PLUS Original Credit Decision Status, <OriginalCreditDecisionStatus>
    - A = Approved
    - D = Denied
  - d. PLUS Credit Appeal (extenuating circumstances) Status, <CreditAppealStatus>
    - A = Approved
    - D = Denied
    - P = Pending
    - R = Closed
  - e. PLUS Credit Decision Date, <CreditDecisionDate>
  - f. PLUS Credit Decision Expiration Date, <CreditDecisionDate>
  - g. PLUS Credit Action Status, <CreditActionStatus>
    - D = Endorser Denied. The applicant needs to obtain a different endorser.

- N = The credit decision has changed from pending to denied or accepted.
  - L = Endorser Approved, but the endorser amount is less than the financial award amount.
- h. PLUS Reconsideration Eligible Flag, <ReconsiderationEligible>
  - i. PLUS Credit Counseling Completed, <PLUSCounselingCompleted>
  - j. PLUS Credit Counseling Completion Date, <PLUSCounselingCompleteDate>
  - k. Credit Requirements Met, <CreditRequirementsMet>
  - l. Endorser Approved, <EndorserApproved>
6. The Endorser Amount, <EndorserAmount> is included in the Credit Status Response to indicate the endorsed amount on the Endorser Addendum.
    - a. The Endorser Amount indicates the total amount of the PLUS loan for which the endorser has agreed to endorse.
    - b. If the Endorser Amount is less than the Award Amount, the school will not be able to disburse more than the endorsed amount.

## DIRECT PLUS LOAN AWARD PROCESSING WITH ENDORSER

When an endorser is approved for a Direct PLUS Loan award, the COD System returns different information depending on a number of factors. The table below provides several general endorser scenarios and explains how they would be processed.

### PLUS Loan Award with Endorser:

Schools should determine whether a PLUS applicant is otherwise eligible and originate the PLUS loan at the time a PLUS Application (SP) response is received or the credit check conducted via the COD Website, if the borrower indicated they intend to obtain an endorser, document extenuating circumstances or is undecided.

Beginning Spring 2015, Direct PLUS Loan borrowers who obtain an endorser must complete PLUS Credit Counseling on StudentAid.gov before a school may disburse on the loan. The Credit Status (CS) Response will contain a new <CreditRequirementsMet> tag with the value of “Y” when all credit requirements are met for disbursing a Direct PLUS Loan.

Endorser Addenda are included in the correspondence that the borrower receives at the time the of the credit decision if denied. If no Direct PLUS Loan Request has been completed and no PLUS loan has been originated, the borrower cannot obtain an endorser addendum.

Important Note: In the scenarios on the next page, we assume the parent has completed a Direct PLUS Loan Request via the StudentAid.gov Website. If a parent has not completed a Direct PLUS Loan Request via the StudentAid.gov Website, the endorser can't complete an Endorser Addendum until a Direct PLUS Loan award has been submitted to and processed by the COD System and the associated Award ID has been provided to the endorser.

If the endorser completes the Endorser Addendum...	AND the endorsed amount is...	AND the Award...	THEN the school will receive...	To resolve, the school...
Via StudentAid.gov Website	Greater than or equal to the requested award amount	Isn't on the COD System	A Credit Status (CS) response with: <code>&lt;EndorserApproved&gt; = 'True'</code> and the endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag	Submits a Direct PLUS Loan to COD
—	—	Is on the COD System	A Credit Status (CS) response with: <code>&lt;EndorserApproved&gt; = 'True'</code> and the endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag	No further action necessary
—	Less than the requested award amount	Isn't on the COD System	A CS response file: <code>&lt;EndorserApproved&gt; tag = 'True'</code> , COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag	Originates the award
—	—	Is on the COD System	A CS response file with: <code>&lt;EndorserApproved&gt; = 'True'</code> , COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag	Resubmits the award, using the same PLUS Loan ID, with the lower award amount (it must be less than or equal to the endorsed amount). **A school may also submit via the COD Web**
Via paper process and returns it to the Department of Education	Greater than or equal to the requested award amount	Isn't on the COD System	A Credit Status (CS) response file with: <code>&lt;EndorserApproved&gt; = 'True'</code> , COD Warning Edit 184 and the lower endorsed amount in the <code>&lt;EndorserAmount&gt;</code> tag	Originates the award Note: It is best practice to determine PLUS loan eligibility and originate the PLUS loan at the time a PLUS Application (SP) response is received if the borrower indicated they intend to obtain an endorser or document extenuating circumstances.



If the endorser completes the Endorser Addendum...	AND the endorsed amount is...	AND the Award...	THEN the school will receive...	To resolve, the school...
—	—	Is on the COD System	A Credit Status (CS) response file with: <EndorserApproved> = 'True', COD Warning Edit 184 and the lower endorsed amount in the <EndorserAmount> tag	No further action necessary
—	Less than the requested award amount	Isn't on the COD System	A CS response file with: <EndorserApproved> = 'True', COD Warning Edit 184 and the lower endorsed amount in the <EndorserAmount> tag	Originates the award
—		Is on the COD System	A CS response file with: <EndorserApproved> = 'True' COD Warning Edit 184 and the lower endorsed amount in the <EndorserAmount> tag	Resubmits the award, using the same PLUS Loan ID, with the lower award amount

Table 36

An em dash or "—" indicates no data.

**Note:** Once the Direct PLUS Loan award is successfully processed, it will build on the COD System and link to the endorser information. The award response (COMRECOP, CRAA, or CRDL) will also include COD Warning Edit 183, PLUS Award Accepted due to Valid Endorser Match.

## Subsidized Usage Limit Processing

In June 2013, the COD System began identifying Direct Loan borrowers who are subject to the 150% Subsidized Usage limit. In April 2014, the COD System required schools to submit new fields on all Direct Loan and TEACH Grants. The COD System will calculate the borrowers usage using the values submitted on the incoming record and the borrower's loan information on the COD System. The COD System will return the calculated values to schools on the common record response.

In April 2014, the COD System retired warning edit 200. The COD System began returning the `<SubsidizedUsageLimitApplies>` at the person level on the common record response to indicate that the person is subject to the 150% Subsidy Usage Limit.

A borrower's Subsidized Usage fields will be viewable on the COD Website. A school report will be available on the COD Reporting Website.

Beginning in March 2015, COD began allowing school users to submit a Subsidized Usage Inquiry through the COD Website when Direct Subsidized Usage issues arise that the school cannot resolve. The page will be accessible from the existing Direct Subsidized Loan Usage page. The inquiry will generate an email to FSA.

In addition, a Subsidized Usage Calculator is available on the COD Website. Users can adjust award and disbursement data to estimate a borrower's subsidized usage results. No changes were made to the borrower's loans within the calculator will be saved to the COD System.

Reminder: It is important to report accurate and timely Direct Loan (subsidized, unsubsidized, and PLUS loan) information to the Common Origination and Disbursement (COD) System. It is equally important that schools update previously reported loan information as needed.

Beginning in July 2021, the COD System will not apply the 150% Subsidized Usage limit for Direct Subsidized Loans with an Earliest Disbursement Date (EDD) on or after 07/01/2021.

## SETTING THE SUBSIDIZED USAGE LIMIT FLAG

COD will continue to identify Direct Loan borrowers subject to the 150% Subsidized Usage limit for any existing Direct Subsidized Loans in the COD System with an Earliest Disbursement Date on or after July 1st 2013 and before July 1st 2021.

### BUSINESS RULES

1. The COD System sets the SULA flag to Yes for a borrower if the following conditions are met:
  - a. A record for the borrower containing a Direct Subsidized or Direct Unsubsidized Loan is submitted to the COD System
  - b. The loan has an earliest disbursement date (EDD) on or after 7/1/2014 and before 7/1/2023

- c. The borrower has no outstanding balance on a Direct Loan or on a FFEL Program loan on July 1, 2014, or on the date the borrower obtains a Direct Loan after July 1, 2014.
  - d. COD will continue to determine a loan's eligibility for SULA if the EDD is on or after 7/1/2014 and before 7/1/2022.
- 2. When the borrower's Subsidized Usage Limit Applies flag has been set to Yes, the date the flag was set displays on the COD Website in the Subsidized Usage Limit Applies Date field.

## SUBSIDIZED USAGE LIMIT INPUT FIELDS

In March 2017, the input fields used to calculate a borrower's subsidized usage were moved from the award level to the disbursement level. These tags are required at the disbursement level for all 2017-18 loans and forward.

For award years 2025-26 and forward, the new CIP complex element and its associated tags will have a maximum of 3 occurrences. When a student is enrolled in multiple programs under the same payment period, up to three CIP tags can be submitted per disbursement.

The following disbursement level tags are required on all Direct Loan records for 2017-18 and forward.

- 1. Program Credential Level <ProgramCredentialLevel>
  - a. The valid values for Program Credential Level are:
    - i. Undergraduate certificate or diploma program
    - ii. Associate's degree
    - iii. Bachelor's degree
    - iv. Post Baccalaureate certificate
    - v. Master's degree
    - vi. Doctoral degree
    - vii. First Professional degree
    - viii. Graduate/Professional certificate
    - ix. Non-credential programs (preparatory coursework/teacher certification)

The input fields to calculate a borrower's subsidized usage will remain at the award level for Award Years 2016-17 and prior.

- b. The COD System will validate the Grade Level on the loan against the submitted Program Credential Level. The chart below outlines the valid Grade Level/Program Credential Level combinations. If an invalid combination is submitted, the COD System will reject the record with edit 208. Since the Program Credential Level is now at the disbursement level, if changes are made to the Student Level Code at the award level, corresponding changes to the Program Credential Level may be required for all disbursements associated with that award.

Description	Program Credential Level	Student Level Code
Undergraduate certificate or diploma program	1	0-5 (Undergraduate)
Associate's degree	2	0-5 (Undergraduate)
Bachelor's degree	3	0-5 (Undergraduate)
Post Baccalaureate certificate	4	0-5 (Undergraduate)
Master's degree	5	0-7 (Undergraduate & Graduate)
Doctoral degree	6	0-7 (Undergraduate & Graduate)
First Professional degree	7	0-7 (Undergraduate & Graduate)
Graduate/Professional certificate	8	0-7 (Undergraduate & Graduate)
Non-credential programs (preparatory coursework/teacher certification)	99	0-5 (Undergraduate)

Table 37

- c. The `<ProgramCredentialLevel>` tag is optional when submitting changes to a disbursement.
- d. The `<ProgramCredentialLevel>` tag must be submitted within the CIP complex element for Award Years 2025-26 and forward.

## 2. Weeks Programs Academic Year `<WeeksProgramsAcademicYear>`

- a. The `<WeeksProgramsAcademicYear>` tag is only valid for the 2014-15 Award Year and forward.
- b. The Weeks Programs Academic Year is the Title IV Academic Year and must be greater than or equal to 26. The COD System will reject the record with edit 209f the Weeks Programs Academic Year is less than 26.

- c. `<WeeksProgramsAcademicYear>` must be submitted when `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` is submitted, or the `<SpecialPrograms>` is set to "Preparatory Coursework Graduate Professional Program."
- d. The `<WeeksProgramsAcademicYear>` tag will be ignored if submitted with the `<PublishedPgmLengthYears>` and will not be stored.
- e. The `<WeeksProgramsAcademicYear>` tag is optional when submitting changes to a disbursement.
  - i. `<WeeksProgramsAcademicYear>` must be submitted when changing the Special Program to 'Preparatory Coursework Graduate Professional Program' or submitting `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` when `<PublishedPgmLengthYears>` was previously submitted for the disbursement.
- f. The `<WeeksProgramsAcademicYear>` tag must be submitted within the CIP complex element for Award 2025-26 and forward.
- g. Special Programs `<SpecialPrograms>`
- h. If the tag is submitted it must include one of the following valid values for Special Programs are:
  - i. 'A' – Selective Admission Associated Program
  - ii. 'B' – Bachelor's Degree Completion Program
  - iii. 'N' – Not Applicable
  - iv. 'P' – Preparatory Coursework Graduate Professional Program
  - v. 'T' – Non-Credential Teacher Certification Program
  - vi. 'U' – Preparatory Coursework Undergraduate Program
- i. The `<SpecialPrograms>` tag is only valid for the 2014-15 Award Year and forward.
- j. The COD System will validate the `<SpecialPrograms>` tag value against the borrower's Grade Level for that loan. The chart below outlines the valid Grade Level / Special Program combinations. If an invalid combination is submitted, the COD System will reject the record with edit 203. Since the Special Program tag is now at the disbursement level, if changes are made to the Student Level Code at the award level, corresponding changes to the Special Program tag may be required for all disbursements associated with that award.

Special Program	Value	Valid Grade Levels
Selective Admission Associated Program	A	0-5
Bachelor's Degree Completion Program	B	0-5

Special Program	Value	Valid Grade Levels
Not Applicable	N	N/A
Preparatory Coursework Graduate Professional Program	P	5
Non-Credential Teacher Certification	T	5
Preparatory Coursework Undergraduate Program	U	1, 0
Tag Not Submitted	N/A	N/A

Table 38

- k. The <SpecialPrograms> tag is optional when submitting an origination or maintenance to a disbursement.
  - l. The <SpecialPrograms> tag must be submitted within the CIP complex element for Award 2025-26 and forward.
3. The COD System will require one of the following disbursement level tags on Direct Loan disbursements:

Schools may submit a new Published Program Length tag without niling out the previously reported. The COD System will use the most recently submitted Published Program Length tag to determine the <CalculatedPublishedProgramLengthYears> tag.

- a. Published Program Length Years <PublishedPgmLengthYears>
- b. Published Program Length Weeks <PublishedPgmLengthWeeks>
- c. Published Program Length Months <PublishedPgmLengthMonths>
- d. A school is only required to submit one of the 3 fields.
- e. If Published Program Length Weeks or Published Program Length Months is submitted, the COD System will use that value to calculate the Published Program Length Years. That calculated value will be returned in the <CalculatedPublishedPgmLengthYears> on the common record response.
- f. If none of the three tags are submitted, the COD System will reject the loan with edit 996.
- g. If more than one of the three tags is submitted, the COD System will reject the loan with edit 202.
- h. If Special Programs is equal to Preparatory Coursework Graduate Professional Program on a Direct Loan origination, a school is not required to submit a Published Program Length tag. If a Published Program Length tag is submitted and Special Programs is equal to

'Prep Grad', the values will be ignored and will not be stored on the system.

- i. Note: if a school submits a change to the Special Programs tag to a value other than 'Prep Grad', the record must contain one of the Published Program Length tags.
- j. The Published Program Length tags are optional on when changes are made to an award.
- k. The Published Program Length tags must be submitted within the CIP complex element for Award 2025-26 and forward.

4. The COD System will require the following tags on Direct Loans disbursements:

a. `<EnrollmentStatus>`

- i. `<EnrollmentStatus>` must equal the enrollment status of the student at the time of disbursement.
- ii. The valid values for `<EnrollmentStatus>` are:
  - 'F' - Full Time = 1.00
  - 'Q' - Three-quarters Time = 0.75
  - 'H' - Half Time = 0.50
  - 'L' - Less than half time (note: 'L' is not valid for Direct Loan disbursements)
- iii. The COD System will reject a disbursement with edit 996 if a value of 'L' is submitted in the `<EnrollmentStatus>` field
- iv. `<EnrollmentStatus>` is optional when submitting changes to disbursements and should only be resubmitted if the original submission was incorrect.
- v. In order to change the tag on a funded disbursement, the disbursement sequence number must be incremented.

5. `<ProgramCIPCode>`

- a. The valid CIP codes can be found at the following location: <http://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55>
- b. The COD System will allow a maximum of three occurrences for the CIP Code field for Award Year 2024-25 and forward.
- c. The COD System will store each CIP Code value once when duplicate values are received with warning edit 131.
- d. The COD System will reject an invalid CIP Code with edit 204.

- e. The COD System will confirm that the Loan Period Begin date is on or after the CIP Code effective date. If the Loan Period Begin Date is before the CIP Code effect date, the COD System will reject the record with edit 204.
  - f. A valid `<ProgramCIPCode>` must be submitted with a disbursement upon origination.
  - g. `<ProgramCIPCode>` is optional when submitting maintenance to a disbursement and should only be resubmitted if the original submission was incorrect.
  - h. `<ProgramCIPCode>` must be submitted within the CIP tag complex element for Award Year 2025-26 and forward.
6. `<ProgramCIPCodeYear>`
- a. The COD System will reject an invalid CIP Code Year with edit 204.
  - b. A valid `<ProgramCIPCodeYear>` must be submitted with a disbursement upon origination.
  - c. `<ProgramCIPCodeYear>` is optional when submitting maintenance to a disbursement and should only be resubmitted if the original submission was incorrect.
7. In order to change the tag on an actual disbursement, the disbursement sequence number must be incremented. Any changes to an accepted actual disbursement must also include an increase to the disbursement sequence number.

COD excludes a payment period (or term) from the subsidized usage calculations when the disbursement amount is zero and the payment period start date is outside the Financial Award Begin and End dates. (i.e. The loan period has been shortened and the payment period (or term) is no longer within the loan period.)

8. `<PaymentPeriodStartDate>`
- a. The Payment Period Start Date must be greater than or equal to the Financial Award Begin Date. If the Payment Period Start Date is not greater than or equal to the Financial Award Begin Date, the COD System will reject the disbursement with edit 205. COD will bypass edit 205 if the disbursement amount is zero.
  - b. Subsequent payment period start date (s) would be equal to the begin date of the subsequent term (s). For example, for schools that submit one disbursement per term/payment period, financial award (loan period) begin date is November 3, 2016 and payment period start date associated with disbursement 1 would be November 3, 2016. The next term (semester, quarter, second half of the clock hours) begins March 2, 2017, so the next payment period start date associated with the second disbursement would be March 2, 2017.

Beginning in October 2016, COD returns Warning Edit 220 at the disbursement level if a disbursement has an amount of zero and the payment period start date occurs within the loan period. The purpose of this is to alert schools that they should submit another updated record shortening the loan period.

- c. `<PaymentPeriodStartDate>` is optional when submitting changes to a disbursement.



- d. In order to change the tag on a funded disbursement, the disbursement sequence number must be incremented.

9. <PaymentPeriodEndDate>

- a. The Payment Period End Date must be less than or equal to Financial Award End Date. If the Payment Period End Date is greater than the Financial Award End Date, the COD System will reject the disbursement with edit 205. COD will bypass edit 205 if the disbursement amount is zero.
- b. Payment Period End Date must be greater than the Payment Start Date. If the Payment Period End Date submitted is less than or equal to the Payment Period Start Date, the COD System will reject the disbursement with Edit 227.
- c. Subsequent payment period end date (s) would be equal to the end date of the subsequent term (s).
- d. For example, for schools that submit one disbursement per term/payment period, Financial award (loan period) end date is June 30, 2025 and payment period end date associated with disbursement 1 can be January 30, 2025. The next term (semester, quarter, second half of the clock hours) ends June 30, 2025 so the next payment period end date associated with the second disbursement would be June 30, 2025.
- e. <PaymentPeriodEndDate> is optional when submitting changes to a disbursement.
- f. In order to change the tag on a funded disbursement, the disbursement sequence number must be incremented.

## SUBSIDIZED USAGE LIMIT CALCULATIONS AND NON-CREDENTIAL TEACHER CERTIFICATION

### SUBSIDIZED USAGE

When the loan's award amount is reduced to below the loan limit, the COD System will recalculate the borrower's Subsidized Usage by dividing loan period length by academic year length and prorate the usage based upon enrollment status. Beginning in April 2014, the COD System began using the required school submitted tags to calculate a borrower's Subsidized Usage. The borrower's calculated Subsidized Usage fields will be returned on the common record response and viewable on the COD Website if the EDD is on or after 7/1/2013 and before 7/1/2021.

#### Loan Limit Exception

The COD System will default the length of time used to 1 year regardless of the actual length of the loan period and academic year when all of the following conditions are true:

- A loan's award amount is equal to the loan limit (for that grade level)
- The loan period is less than the academic year.
- The borrower does not have another active Direct Subsidized Loan within the same academic year at a higher grade level.

The usage will then be prorated based upon enrollment status reported for each disbursement.

Beginning in October 2016, COD corrects the award amount down to the sum of the actual and anticipated disbursements.

There are two categories of subsidized usage:

- Undergraduate Subsidized Usage which includes loans received while enrolled in undergraduate programs excluding non-credential teacher certification programs.

The COD System will determine the subsidized usage category based upon the value submitted in the `<SpecialPrograms>` tag submitted in the incoming record. If a value other than 'T' (Non-Credential Teacher Certification) is submitted, the COD System will categorize the usage calculated as undergraduate subsidized usage. The subsidized usage calculations will exclude loans that have a value of 'T' in the `<SpecialPrograms>` field.

- Non-Credential Teacher Certification Usage which includes loans received while enrolled in non-credential certification programs only. The COD System will determine the subsidized usage category based upon the value submitted in the `<SpecialPrograms>` tag submitted in the incoming record. If the value of 'T' (Non-Credential Teacher Certification) is submitted, the COD System will categorize the usage calculated as non-credentialed teacher certification subsidized usage. The non-credentialed teacher certification subsidize usage calculations will exclude loans which do not have a value of 'T' in the `<SpecialPrograms>` field. See the 'Non-Credential Teacher Certification Program Processing' section for more information.

**Note:** For all 2017-18 awards, the Special Programs tag moved to the disbursement block. This may result in disbursements for a single Direct Loan award to have different Special Programs values. The COD System will determine whether Undergraduate Subsidized usage or Non-Credential Teacher Certification usage is calculated based off other relevant disbursement data; the usage for that award will continue to only apply to one subsidized usage category.

If a Direct Subsidized Loan has only anticipated disbursements (all disbursements have a disbursement release indicator of false), COD will include the loan only in calculations for that loan and return anticipated subsidized usage calculation values for that loan.

If a Direct Subsidized Loan has at least one actual disbursement (at least one disbursement has a disbursement release indicator of true), COD will include that loan in all subsidized usage calculations for that borrower and return actual subsidized usage calculation values for that loan.

### Special Programs:

The Special Programs tag has been moved to the disbursement level for Direct Loans for the 2017-18 Award year and forward.

## Subsidized Usage Calculation Business Rules

1. The COD System will calculate Non-Credential Teacher Certification Subsidized Usage values for Direct Subsidized Loans with a value 'T' in the `<SpecialPrograms>` field.
2. The COD System will calculate Undergraduate Subsidized Usage values for Direct Subsidize Loans that don't have a value of 'T' in the `<SpecialPrograms>` field.
3. A borrower may have both Undergraduate Subsidized Usage values and Non-Credential Teacher Certification values. If a Direct Loan has disbursements with different values in the `<SpecialPrograms>` field, COD will determine which subsidized usage category to use
4. The COD System will return different tags in the common response for borrowers enrolled in a Non-Credentialed Teacher Certification Program.
5. The COD System will calculate and return in the common record response the following person-level Subsidized Usage values:

Undergraduate Tags	Non-Credential Teacher Certification Tags
<b>a. &lt;SubsidizedUsageLimitApplies&gt; (Shared)</b>	
<ul style="list-style-type: none"> <li>Reference the 'Setting the Subsidized Usage Limit Flag' section for more information on how COD will calculate this field.</li> <li>The Subsidized Usage Limit Applies field will be returned at the person level on the common record response file.</li> </ul>	
<b>b. &lt;SumActualSubUsagePeriods&gt;</b>	<b>b. &lt;SumNonCredTeachCertActualSubUsagePeriods&gt;</b>
<ul style="list-style-type: none"> <li>The &lt;SumActualSubUsagePeriods&gt; is the total of all &lt;ActualSubUsagePeriods&gt; for the student.</li> </ul>	<ul style="list-style-type: none"> <li>The &lt;SumActualSubUsagePeriods&gt; is the total of all actual Subsidized Usage periods for the student.</li> </ul>
<ul style="list-style-type: none"> <li>The &lt;SumActualSubUsagePeriod&gt; will be returned on the common record response at the person level.</li> </ul>	<ul style="list-style-type: none"> <li>The &lt;SumActualSubUsagePeriod&gt; will be returned on the common record response at the person level for applicable borrowers.</li> </ul>

Table 39

6. The COD System will calculate and return the following award-level Subsidized Usage tags and values in the common record response:

Undergraduate Tags	Non-Credential Teacher Certification Tags
<b>a. &lt;CalculatedPublishedPgmLengthYears&gt;</b>	<b>b. &lt;CalculatedPublishedPgmLengthYears&gt;</b>
<ul style="list-style-type: none"> <li>The COD System will calculate the &lt;CalculatedPublishedPgmLengthYears&gt; using the values submitted for &lt;PublishedPgmLengthWeeks&gt; or &lt;PublishedPgmLengthMonths&gt;, and &lt;WeeksProgramsAcademicYear&gt;.</li> </ul>	<ul style="list-style-type: none"> <li>The COD System will calculate the &lt;CalculatedPublishedPgmLengthYears&gt; using the values submitted for &lt;PublishedPgmLengthWeeks&gt; or &lt;PublishedPgmLengthMonths&gt;, and &lt;WeeksProgramsAcademicYear&gt;.</li> </ul>
<ul style="list-style-type: none"> <li>If &lt;PublishedPgmLengthYears&gt; is submitted, that value will be returned in &lt;CalculatedPublishedPgmLengthYears&gt;.</li> </ul>	<ul style="list-style-type: none"> <li>If &lt;PublishedPgmLengthYears&gt; is submitted, that value will be returned in &lt;CalculatedPublishedPgmLengthYears&gt;.</li> </ul>
<ul style="list-style-type: none"> <li>The &lt;CalculatedPublishedPgmLengthYears&gt; value is used to determine the &lt;MaxSubEligibilityPeriod&gt;, and &lt;RemainingSubEligibilityPeriod&gt; for that loan.</li> </ul>	<ul style="list-style-type: none"> <li>The &lt;CalculatedPublishedPgmLengthYears&gt; value is used to determine the &lt;MaxSubEligibilityPeriod&gt;, and &lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt; for that loan.</li> </ul>
<ul style="list-style-type: none"> <li>The COD System will recalculate the value if any of the incoming Published Program Length values change or &lt;WeeksProgramsAcademicYear&gt; changes.</li> </ul>	<ul style="list-style-type: none"> <li>The COD System will recalculate the value if any of the incoming Published Program Length values change or &lt;WeeksProgramsAcademicYear&gt; changes.</li> </ul>

Table 40

Undergraduate Tags	Non-Credential Teacher Certification Tags
<b>a. &lt;MaxSubEligibilityPeriod&gt; (Shared Tag)</b>	<b>b. &lt;MaxSubEligibilityPeriod&gt; (Shared Tag)</b>
<ul style="list-style-type: none"> <li>&lt;MaxSubEligibilityPeriod&gt; is the maximum period of time in which a student may receive a subsidized loan based on the published program length reported for the loan. It is equal to 150% of the calculated published program length in academic years.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;MaxSubEligibilityPeriod&gt; is the maximum period of time in which a student may receive a subsidized loan based on the published program length reported for the loan. It is equal to 150% of the calculated published program length in academic years.</li> </ul>
<ul style="list-style-type: none"> <li>The COD System will recalculate the value when any of the incoming Published Program Length values change.</li> </ul>	<ul style="list-style-type: none"> <li>The COD System will recalculate the value when any of the incoming Published Program Length values change.</li> </ul>
<b>c. &lt;AcademicYearLength&gt;</b>	<b>d. &lt;AcademicYearLength&gt;</b>
<ul style="list-style-type: none"> <li>The &lt;AcademicYearLength&gt; is the length of the student's Academic Year at the school.</li> </ul>	<ul style="list-style-type: none"> <li>The &lt;AcademicYearLength&gt; is the length of the student's Academic Year at the school.</li> </ul>
<ul style="list-style-type: none"> <li>The field is calculated using the Academic Year Begin and End dates submitted on the award.</li> </ul>	<ul style="list-style-type: none"> <li>The field is calculated using the Academic Year Begin and End dates submitted on the award.</li> </ul>
<ul style="list-style-type: none"> <li>The COD System will recalculate the field if the Academic Year Begin or End dates change.</li> </ul>	<ul style="list-style-type: none"> <li>The COD System will recalculate the field if the Academic Year Begin or End dates change.</li> </ul>
<b>e. &lt;LoanPeriodLength&gt;</b>	<b>f. &lt;LoanPeriodLength&gt;</b>
<ul style="list-style-type: none"> <li>The &lt;LoanPeriodLength&gt; is the period of time covered by the loan.</li> </ul>	<ul style="list-style-type: none"> <li>The &lt;LoanPeriodLength&gt; is the period of time covered by the loan.</li> </ul>
<ul style="list-style-type: none"> <li>The field is calculated using the Financial Award Begin and End Dates</li> </ul>	<ul style="list-style-type: none"> <li>The field is calculated using the Financial Award Begin and End Dates</li> </ul>
<ul style="list-style-type: none"> <li>If the borrower has more than one loan and the loan periods overlap, the COD System will prorate the loan period length for those loans.</li> </ul>	<ul style="list-style-type: none"> <li>If the borrower has more than one loan and the loan periods overlap, the COD System will prorate the loan period length for those loans.</li> </ul>
<ul style="list-style-type: none"> <li>The COD System will recalculate the value if:</li> </ul>	<ul style="list-style-type: none"> <li>The COD System will recalculate the value if:</li> </ul>
<ol style="list-style-type: none"> <li>The Financial Award Begin or End Dates change for that award or any award with overlapping loan periods.</li> </ol>	<ol style="list-style-type: none"> <li>The Financial Award Begin or End Dates change for that award or any award with overlapping loan periods.</li> </ol>
<ol style="list-style-type: none"> <li>The award amount increases or decreases for that award or any award with overlapping loan periods</li> </ol>	<ol style="list-style-type: none"> <li>The award amount increases or decreases for that award or any award with overlapping loan periods</li> </ol>
<ol style="list-style-type: none"> <li>The Disbursement Release Indicator changes on a disbursement for that award or any award with overlapping loan periods</li> </ol>	<ol style="list-style-type: none"> <li>The Disbursement Release Indicator changes on a disbursement for that award or any award with overlapping loan periods</li> </ol>

Undergraduate Tags	Non-Credential Teacher Certification Tags
4. That award or any award with overlapping loan periods are discharged under certain conditions.	4. That award or any award with overlapping loan periods are discharged under certain conditions.
5. That award or any award with overlapping loan periods are reduced to zero as a result of a payment to servicer transaction.	5. That award or any award with overlapping loan periods are reduced to zero as a result of a payment to servicer transaction.

Table 41

Undergraduate Tags	Non-Credential Teacher Certification Tags
<ActualSubUsagePeriod>	<ActualNonCredTeacherCertSubUsagePeriod>
<ul style="list-style-type: none"> <li>&lt;ActualSubUsagePeriod&gt; is the period of time used by the student related to the reported loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt; is the period of time used by the student related to the reported loan.</li> </ul>
<ul style="list-style-type: none"> <li>&lt;ActualSubUsagePeriod&gt; is returned when the loan has at least one actual disbursement (DRI= true).</li> </ul>	<ul style="list-style-type: none"> <li>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt; is returned when the loan has at least one actual disbursement (DRI= true)</li> </ul>
<ul style="list-style-type: none"> <li>&lt;ActualSubUsagePeriod&gt; is calculated using loan period length, academic year length and enrollment status.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt; is calculated using loan period length, academic year length and enrollment status</li> </ul>
<AnticipatedSubUsagePeriod>	<AnticipatedNonCredTeacherCertSubUsagePeriod>
<ul style="list-style-type: none"> <li>&lt;AnticipatedSubUsagePeriod&gt; is the period of time used by the student related to the reported loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt; is the period of time used by the student related to the reported loan.</li> </ul>
<ul style="list-style-type: none"> <li>&lt;AnticipatedSubUsagePeriod&gt; is returned only when the reported loan has only anticipated disbursements (DRI=false).</li> </ul>	<ul style="list-style-type: none"> <li>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt; is returned only when the reported loan has only anticipated disbursements (DRI=false).</li> </ul>
<ul style="list-style-type: none"> <li>The &lt;AnticipatedSubUsagePeriod&gt; is calculated using the Loan Period Length, Academic Year Length, and the Enrollment Status.</li> </ul>	<ul style="list-style-type: none"> <li>The &lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt; is calculated using the Loan Period Length, Academic Year Length, and the Enrollment Status.</li> </ul>
<SumActualSubUsagePeriods>	<SumActualNonCredTeacherCertSubUsagePeriods>
<ul style="list-style-type: none"> <li>&lt;SumActualSubUsagePeriods&gt; is the sum of all actual Subsidized Usage periods for the student for the reported loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;SumActualNonCredTeacherCertSubUsagePe riods&gt; is the sum of all actual Non Credential Teacher Certification Subsidized Usage periods for the student for the reported loan.</li> </ul>

Undergraduate Tags	Non-Credential Teacher Certification Tags
<ul style="list-style-type: none"> <li>&lt;SumActualSubUsagePeriods&gt; is returned only when at least one actual disbursement (DRI=true) for the reported loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;SumActualNonCredTeacherCertSubUsagePeriods&gt; is returned only when at least one actual disbursement (DRI=true) for the reported loan.</li> </ul>
<SumAnticipatedSubUsagePeriods>	<SumAnticipatedNonCredTeacherCertSubUsagePeriods>
<ul style="list-style-type: none"> <li>&lt;SumAnticipatedSubUsagePeriods&gt; is the sum of all actual Subsidized Usage periods for the student, plus the Subsidized Usage period for the reported loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;SumAnticipatedNonCredTeacherCertSubUsagePeriods&gt; is the sum of all actual Subsidized Usage periods for the student, plus the Subsidized Usage period for the reported loan.</li> </ul>
<ul style="list-style-type: none"> <li>&lt;SumAnticipatedSubUsagePeriods&gt; is returned only when all disbursements for the reported loan are anticipated (DRI=false).</li> </ul>	<ul style="list-style-type: none"> <li>&lt;SumAnticipatedNonCredTeacherCertSubUsagePeriods&gt; is returned only when all disbursements for the reported loan are anticipated (DRI=false).</li> </ul>

Table 42

Undergraduate Tags	Non-Credential Teacher Certification Tags
<RemainingActualSubEligibilityPeriod>	<RemainingActualNonCredTeacherCertSubEligibilityPeriod>
<ul style="list-style-type: none"> <li>&lt;RemainingActualSubEligibilityPeriod&gt; is the remaining period of time in which the student may receive a Direct Subsidized Loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt; is the remaining period of time in which the student may receive a Direct Subsidized Loan.</li> </ul>
<ul style="list-style-type: none"> <li>&lt;RemainingActualSubEligibilityPeriod&gt; is returned only when there is at least one actual disbursement (DRI=true) for the reported loan</li> </ul>	<ul style="list-style-type: none"> <li>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt; is returned only when there is at least one actual disbursement (DRI=true) for the reported loan</li> </ul>
<ul style="list-style-type: none"> <li>&lt;RemainingActualSubEligibilityPeriod&gt; is equal to the &lt;MaxSubEligibilityPeriod&gt; minus the &lt;SumActualSubUsagePeriods&gt;</li> </ul>	<ul style="list-style-type: none"> <li>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt; is equal to the &lt;MaxSubEligibilityPeriod&gt; minus the &lt;SumActualSubUsagePeriods&gt;</li> </ul>
<RemainingAnticipatedSubEligibilityPeriod>	<RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod>
<ul style="list-style-type: none"> <li>&lt;RemainingAnticipatedSubEligibilityPeriod&gt; is the remaining period of time in which the student may receive a Direct Subsidized Loan.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt; is the remaining period of time in which the student may receive a Direct Subsidized Loan.</li> </ul>
<ul style="list-style-type: none"> <li>&lt;RemainingAnticipatedSubEligibilityPeriod&gt; is returned only when all disbursements for the reported loan are anticipated (DRI=false)</li> </ul>	<ul style="list-style-type: none"> <li>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt; is returned only when all disbursements for the reported loan are anticipated (DRI=false)</li> </ul>

Undergraduate Tags	Non-Credential Teacher Certification Tags
<ul style="list-style-type: none"><li>&lt;RemainingAnticipatedSubEligibilityPeriod&gt; is equal to the &lt;MaxSubEligibilityPeriod&gt; minus the &lt;SumAticipatedSubUsagePeriods&gt;</li></ul>	<ul style="list-style-type: none"><li>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt; is equal to the &lt;MaxSubEligibilityPeriod&gt; minus the &lt;SumAticipatedSubUsagePeriods&gt;</li></ul>

Table 43

**Note:** Beginning in October 2016, COD will bypass existing edit 206 for origination or maintenance records that cause the loan’s Remaining Subsidized Eligibility Period to increase or stay the same.

## REPORTING NON-CREDENTIAL TEACHER CERTIFICATION PROGRAMS FOR PRIOR AWARD YEARS

For instructions on how to submit the Non-Credential Teacher Certification Program for prior years, please reference the 2014-15 Technical Reference.

## SUBSIDIZED USAGE CALCULATION CHANGE SYSTEM GENERATED RESPONSE

The Subsidized Usage System Generated Response (CRSUYYP) allows a school to update their system with the most accurate Subsidized Usage information for the loan.

A borrower’s Subsidized Usage Period and Remaining Subsidized Eligibility Period are calculated using the value returned in the <LoanPeriodLength> tag, which is also calculated by the COD System.

Recalculation of the Loan Period Length (and subsequent downstream COD calculations) is not limited to activity submitted by the school. The Loan Period Length on a loan may change as a result of updates submitted by another school on an overlapping loan. This may also apply to two loans at a single school, if they have overlapping Financial Award Begin and End Dates. Additionally, a loan’s Loan Period Length may also be recalculated for the following reasons:

- Zeroing out an award amount
- Increasing an award amount from zero
- Increasing an award amount to the loan limit (see Loan Limit Exception information box above)
- Decreasing an award amount from the loan limit (see Loan Limit Exception information box above)
- Changing award from anticipated to actual.
- Loan Discharge



- Loan paid in full within 120 days

The COD System will send a Subsidized Usage Unsolicited System Generated Response to schools in situations where activity has caused a loan's calculated Subsidized Usage values to change, and that school did not receive the latest information in their last common record response file. The Subsidized Usage system generated response is to be used by the schools to update Subsidized Usage in their system. Students with remaining Subsidized Usage less than or equal to zero have reached their maximum subsidized eligibility limit based on the program length reported for that loan.

## BUSINESS RULES

1. The Subsidized Usage System Generated Response is sent to a school's TG mailbox daily.
2. A COD system-generated Subsidized Usage response contains a Document Type of SU. The Document Type indicates the type of Response.
3. The Subsidized Usage System Generated Response contains a system-generated Document ID.
4. The Subsidized Usage System Generated Response may contain the following data elements in the Response Complex Element:
  - a. Calculated Published Program LengthYears
  - b. Anticipated Subsidized Usage Period
  - c. Actual Subsidized Usage Period
  - d. Academic Year Length
  - e. Loan Period Length
  - f. Maximum Subsidized Eligibility Period
  - g. Remaining Actual Subsidized Eligibility Period
  - h. Remaining Anticipated Subsidized Eligibility Period
  - i. Sum Anticipated Subsidized Usage Periods
  - j. Anticipated Non-Credential Teacher Certification Program Subsidized Usage Period
  - k. Actual Non-Credential Teacher Certification Program Subsidized Usage Period
  - l. Remaining Actual Non-Credential Teacher Certification Program Subsidized Eligibility Period
  - m. Remaining Anticipated Non-Credential Teacher Certification Program Subsidized Eligibility Period

- n. Sum Anticipated Non-Credential Teacher Certification Program Subsidized Usage Periods
  - o. Subsidized Usage Limit Applies
  - p. Sum Actual Subsidized Usage Periods
  - q. Sum Actual Non-Credential Teacher Certification Subsidized Usage Periods
5. The Subsidized Usage System Generated Response will be sent for prior award years. This will allow schools to import calculated Subsidized Usage values for prior award years.
6. The message class for the Subsidized Usage System Generated Response is CRSUYYOP, where YY is equal to the award year. Below is a chart listing the valid message classes by award year:

Award Year	Message Class
2022-2023	CRSU23OP
2021-2022	CRSU22OP
2020-2021	CRSU21OP
2019-2020	CRSU20OP
2018-2019	CRSU19OP
2022-2023	CRSU23OP
2017-2018	CRSU18OP
2016-2017	CRSU17OP
2015-2016	CRSU16OP
2014-2015	CRSU15OP

Table 44

7. Schools do not have the option to opt-out of receiving the Subsidized Usage System Generated Responses.
8. Schools may request a borrower's most recent Subsidized Usage via System Generated Responses via the [COD Website](#).
- a. A COD Web user may request a borrower's Subsidized Usage information using the Subsidized Usage Request page under the 'Batch' tab of the [COD Website](#).
  - b. Users must search by borrower SSN and associated Entity ID in order to request the most recent Subsidized Usage information for that borrower.

## REQUIRED UPDATES/LOAN REDUCTIONS

In Dear Colleague Letter Gen-13-13, schools are required to reduce remaining anticipated disbursements to zero, adjust all award amounts to equal the sum of actual disbursements, and adjust loan period dates to remove terms/payment periods for which no disbursement was made or retained. These changes are to be made within the 15-day reporting guidelines. For more detailed guidance see the Electronic Announcement 150% Direct Subsidized Loan Limit: Electronic Announcement #21 - Common Subsidized Loan Limit Usage Inquiries.

Beginning late 2017, in cases where the school has not made the required updates, the COD System will update the records when:

1. The school or FSA confirms the school has closed out for the award year for which the loan was reported and/or
2. The data submission [closeout] deadline has passed, the school is not on extended processing and the latest loan period (i.e. the financial award end date) for that school is in the past.

The COD System will reduce remaining anticipated disbursements to zero, adjust all award amounts to equal the sum of actual disbursements, adjust loan period dates so that all zero dollar disbursements are outside the loan period, and recalculate subsidized usage for each borrower.

Because COD performs the SULA Adjustment reductions/updates when a school confirms program year closeout, schools should be vigilant in selecting the correct award year to close out and note that it may not be the award year to which the display defaults.

When the reductions occur, the school will receive Subsidized Usage Change Responses (CRSUXOP) for the loans impacted with the updated subsidized usage values. The school will not receive a Common Record response for these changes because the award year has been closed out.

A new SULA Adjustments Needed Report will be provided during the program year closeout timeframe which will list the loans that appear to need adjustment. See the Volume 6, Section 8 for details.

The system generated loan reductions in no way relieves schools of their obligation to accurately report and update loan data per FSA Handbook guidance.

## Direct Loan Closeout

The COD System provides the ability for schools to perform end of program year closeout activities for Award Year 2011-12 and forward.

The Direct Loan established data submission (closeout) deadline for the 2025-26 Program Year is July 30, 2027. This is the last processing day of the program year, so all school data must be received and accepted by this date in order to be included in a school's final Ending Cash Balance for the year.

As a reminder, all cash management, disbursement reporting, and monthly reconciliation regulatory requirements supersede the data submission deadline. If a school is meeting these regulatory requirements, the final closeout stage should begin no later than the last award end date at the school for a given program and award year. In other words, a school should be able to reconcile to a zero Ending Cash Balance and close out soon after its final disbursements and should not wait until the data submission (closeout) deadline.

**Note:** Exceptions to the last processing day of the program year may be made on a case-by-case basis, if the school's processing period extends beyond the data submission deadline. Once the closeout deadline has passed, requests for extensions to submit new or increased awards, new disbursements, or upward disbursement adjustments may be made via the Request Reopen/Extended Processing page on the COD website.

Schools do not need to request Extended Processing to process downward adjustments to disbursements or non-financial changes. See the Extended Processing section below for more information.

### BUSINESS RULES

1. When a school's internal ending cash balance and un-booked loans are \$0, it is in agreement with the ending cash balance reflected in the school's most recent Direct Loan School Account Statement (SAS) for the award year, and the school has no outstanding issues for this program year, the school should complete the School Balance Confirmation Form on the COD website. Once the school has successfully confirmed closeout the following actions will occur:
  - a. The Department will send a Program Year Closeout letter to the school's President and Financial Aid Director.
  - b. COD will reject award and disbursement increases and new disbursements per published edits.
  - c. The Department will reduce the school's Current Funding Level (CFL) to the greater of Net Drawdowns or Net Accepted & Posted Disbursements.
  - d. The Department will reduce remaining anticipated disbursements to zero, adjust all award amounts to equal the sum of actual disbursements, adjust loan period dates so that all zero dollar disbursements are outside the loan period, and recalculate subsidized usage for each borrower.
  - e. The SAS and other reports for this award year and program will no longer be sent.

**NOTE:** If the school needs to submit award or disbursement increases or new disbursements in the future, they must request to be reopened or placed on extended processing via the Request Reopen/Extended Processing page on the COD website. Schools do **not** need to request to be reopened or placed on extended processing if they are processing non-financial changes, decreases to awards, or decreases to actual disbursements.

2. COD will send the following closeout correspondence:

- a. **Notification Warning Letter:** Sent to schools as a reminder to finish processing and confirm closeout before the established data submission (closeout) deadline.
- b. **Remaining Balance Letter:** Informs the school that they have a remaining balance that needs to be reconciled before they can close out the award year. The letter notifies the school of the number of days they are past the Latest Award End Date.
- c. **Zero Balance Letter:** Informs the school that they have a \$0 Ending Cash Balance in COD. It instructs the school to use the School Balance Confirmation page on the COD Website to confirm closeout if the school agrees with the balance information and is fully reconciled.

**NOTE:** Starting in June 2017, schools will no longer need to wait for a Direct Loan Zero Balance letter to use the School Balance Confirmation page in COD. However, schools should wait for a School Account Statement with a \$0.00 Ending Cash Balance to do a final reconciliation prior to officially closing out the award year.

- d. **Program Year Closeout Letter:** Sent to schools once they have completed the balance confirmation process and considered closed out for the requested program and award year. This includes completing the School Balance Confirmation page in COD Website and verifying their ending cash balance and unbooked loans balances haven't changed.
- e. **Reopen Change Letter:** Sent to schools to notify them that they are no longer considered confirmed closed out for the award year because:
  - The school's balances in the COD System have changed and/or
  - Staff at school has requested to be reopened to continue processing via the Request Reopen/Extended Processing page on the COD Website.
- f. **Extended Processing Letter:** Sent to schools that have been approved for an extension to the data submission deadline. Notifies the school of the expiration date of that extension.

**NOTE:** Schools can find a HTML copy of the above correspondence on the School Correspondence page via the COD Website.

## EXTENDED PROCESSING

The deadline by which a school must submit Direct Loan student award and disbursement data is published by Federal Register Notice each award year. Exceptions to this data submission (closeout) deadline may be made on a case-by-case basis if the school's processing period extends beyond this date. Schools may submit **decreases** to previously accepted award or disbursement amounts or **non-financial changes** and/or process refunds of cash in G5 without prior approval (e.g., no extension is needed). To submit **increases** to award or disbursement amounts, schools must first request an extension via the Request Reopen/Extended Processing link under the school menu on the COD website.

The following business rules apply to this process.

### BUSINESS RULES

1. After the Direct Loan award year's data submission (closeout) deadline:
  - a. The COD System accepts and processes **decreases** to previously accepted award originations, **decreases** to previously accepted disbursements, and adjustments to **non-financial data fields**. **No extended processing is needed.**
  - b. The COD System will **not** accept new or increased award amounts without an approved extension (Extended Processing). COD will return the following edits:
    - i. 043 – New Award Amount or Award Increase Received After End of Processing Year and Institution Has Not Been Granted Extended Processing.
    - ii. 071 – New Disbursement (DRI=True) or Disbursement Increase Received After End of Processing Year and Institution Has Not Been Granted Extended Processing.
2. To resolve these edits:
  - a. Review your records.
  - b. If the records you are attempting to report are:
    - i. Decreases or non-financial changes: make any corrections and resubmit only the decrease or non-financial change to COD.
    - ii. New or increased award or disbursements amounts: Request an extension to the data submission deadline (see next step).
3. If an extension is needed (new or increased award or disbursement amounts only):
  - a. Use the Request Reopen/Extended Processing page on the COD website to submit a request. Requests will be reviewed on a case-by-case basis and must meet applicable regulatory requirements.
  - b. If your request is approved:

- i. You will receive electronic notification from COD. An email/letter will be sent to your President and Financial Aid Administrator documenting approval of the request and listing the extended processing expiration date. This correspondence will also be available on the COD website School Correspondence page on the next business day.
- ii. You must submit your schools new/updated data within the granted extension period.
- c. If your request is denied or if FSA has additional questions, you will receive a response via email with more information. This email will be sent to the Requestor Email Address included in the request.

## StudentAid.gov Website

The StudentAid.gov Website offers the following functionality for Direct Loan borrowers and TEACH Grant recipients:

- Annual Student Loan Acknowledgement
- Electronic Master Promissory Note (eMPN)
- Entrance Counseling
- Exit Counseling
- PLUS Credit Counseling
- Direct PLUS Loan Requests
- Endorser Addendum
- Electronic Correspondence
- Electronic application for Income Driven Repayment plans
- Loan Consolidation
- Deferment, forbearance and repayment plan forms (downloadable)
- TEACH Grant Agreement to Serve or Repay
- TEACH Grant Initial and Subsequent Counseling
- TEACH Grant Exit Counseling
- TEACH Grant Conversion Counseling

## ELECTRONIC MASTER PROMISSORY NOTE

Direct Subsidized/Direct Unsubsidized, and Direct PLUS for Graduate/Professional students and Parent borrowers may complete and submit an electronic Master Promissory Note using the StudentAid.gov Website.



## DIRECT LOAN ENTRANCE COUNSELING

In February 2021, Direct Loan Entrance Counseling on StudentAid.gov was redesigned to include short modules of streamlined content and integration with College Scorecard. The entrance counseling meets regulatory requirements, and a demo version is viewable outside login. Schools have the option to receive “Daily” or “On-demand” responses when a student completes entrance counseling on StudentAid.gov. School users are able to search for and view Entrance Counseling completion information and counseling responses on the [COD Website](#).

There are two types of Direct Loan Entrance Counseling available for search on the Direct Loan Counseling search page:

- Direct Sub/Unsub Entrance Counseling – Signifies that the student has completed Sub/Unsub Entrance Counseling.
- Direct Sub/Unsub/PLUS Entrance Counseling – Signifies that the student has completed Sub/Unsub and PLUS Loan Entrance Counseling.

## BUSINESS RULES FOR DIRECT LOAN ENTRANCE COUNSELING

1. Completion of Direct Loan Entrance Counseling in StudentAid.gov is optional and not required for a student to complete an MPN or PLUS Loan Request.
2. Direct Loan Entrance Counseling will be solely associated with the student and not with any individual Direct Loan award or MPN.
3. A student must complete the entire Counseling session and submit for the session to be considered complete. Incomplete Counseling sessions will not be saved.
4. Entrance Counseling satisfies the regulatory requirements for completing Entrance Counseling.
5. The following school options are available on the School Options page on the [COD Website](#) and can be updated at any time:
  - a. Electronic Entrance Counseling Participant
    - Y indicates the school participates in electronic entrance counseling.
    - N indicates the school does not participate in electronic entrance counseling.
  - b. Entrance Counseling Response Frequency
    - On-Demand
    - Daily
6. New schools are defaulted to ‘Daily for the ‘Entrance Counseling Response Frequency’ option.

7. Entrance counseling completion information will be retrievable by authorized users on the existing Counseling Search page under the Person tab.
  - a. If a school chooses not to receive Entrance Counseling responses, completion information will be available via the counseling search page.
  - b. School users will be able to download the counseling search results as a .csv file after the search results are returned.
8. If a StudentAid.gov user selects a school to notify of entrance counseling completion, the completion information is included in the Counseling Report regardless of the frequency to receive responses the school selected.

## DIRECT LOAN EXIT COUNSELING

In February 2021, Direct Loan Exit Counseling on StudentAid.gov was redesigned and it meets the regulatory requirements. A demo of the counseling is viewable outside login. Schools have the option to receive “Daily” or “On-demand” responses when a borrower completes exit counseling on StudentAid.gov. The exit counseling reports available on NSLDS will continue to be available with data received from StudentAid.gov. The COD Counseling Report includes exit counseling completion information.

**Note:** The Counseling Type tag is populated with 'ExitCounseling' (without spaces) in the response.

School users are also able to search for and view exit counseling completion information and counseling responses on the COD Website.

## BUSINESS RULES

1. Completing exit counseling electronically on StudentAid.gov is optional.
  - a. Electronic exit counseling satisfies the regulatory requirements for exit counseling.
2. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information to be available in COD.
3. The following school option is available on the COD Web School Options page and can be updated at any time:
  - a. Exit Counseling Response Frequency
    - On-Demand
    - Daily
4. New schools are defaulted to ‘Daily’ for the ‘Exit Counseling Response Frequency’ option.

5. Schools that were not participating in entrance counseling were defaulted to 'On-demand' for the 'Exit Counseling Response Frequency option.
6. A system generated response is sent to schools for exit counseling using existing message class CRECMYOP with `<CounselingType>` tag defined as 'ExitCounseling'.
7. Exit counseling completion information is available on the COD Web Counseling Search page under the Person tab.
  - a. If your school is not selected by the student, exit counseling completion information is only retrievable using the student's SSN.
  - b. Authorized users are able to download the counseling search results as a .csv file after the search results are returned.
8. If a StudentAid.gov user selects a school to notify of exit counseling completion, the completion information is included in the Counseling Report regardless of the frequency to receive responses the school selected.

## PLUS CREDIT COUNSELING

PLUS Credit Counseling is available on StudentAid.gov. Anyone can complete PLUS Credit Counseling. A demo of the counseling is viewable outside of login.

The PLUS Credit Counseling Completion Status is available on the following COD Web pages:

- Credit Check Information
- Batch Search
- Search Results
- Batch Detail Information (only if viewing a CS response)
- Response Information (only if viewing a CS response)

PLUS Credit Counseling Completion status is included in the Credit Status Report.

## BUSINESS RULES

1. PLUS applicants who have obtained an approved endorser or an approved credit appeal due to extenuating circumstances are required to complete PLUS Credit Counseling before the loan may be disbursed. (See the Direct PLUS Loan Credit Check section).
2. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information to be available in COD.

3. The Credit Status Response is sent to schools associated with a PLUS applicant with a denied credit decision when he/she completes counseling. (See the Generating Credit Status Responses section).
4. Schools can search by SSN for PLUS Credit Counseling on the COD Web Counseling Search Page.
5. Authorized users are able to download the counseling search results as a .csv file after the search results are returned.

## DIRECT PLUS LOAN REQUESTS

The Direct PLUS Loan Request is an electronic form used to gather and communicate borrower and student information to the school to aid in the origination process. The PLUS Loan Request processing includes borrower-initiated credit check. The PLUS Loan Request is stored on the COD System and responses are sent to participating schools to enable them to create a PLUS loan.

### BUSINESS RULES

1. The StudentAid.gov Website allows borrowers to complete a Direct PLUS Loan Request which includes a credit check.
2. Completion of a Direct PLUS Loan Request on StudentAid.gov doesn't create a Direct PLUS Loan on the COD System.
3. The StudentAid.gov Website will perform a check of the applicant's default status from NSLDS.
4. If a borrower's credit decision is denied, the borrower is prompted to select one of the following options:
  - a. I want to obtain an endorser.
  - b. I want to provide documentation of extenuating circumstances.
  - c. I do not want to pursue a Direct PLUS loan at this time.
  - d. Undecided
5. An endorser is able to complete an endorser addendum via the StudentAid.gov Website and submit it online. Note: Endorsers still have the option of submitting a paper endorser addendum.
6. A response will be sent to notify the school that a Direct PLUS Loan Request has been completed and include the results of the credit check and the default status.
7. An Application ID will be generated and assigned to each completed Direct PLUS Loan Request. This identifier is for reference purposes only and is not required for PLUS award processing.
8. A new Relationship to Student `<RelationshipToStudent>` tag will be added in a future update to the PLUS Application response for Parent

borrowers with the following values:

- a. P = Biological Parent of the Dependent Undergraduate Student
- b. A = Legal Adoptive Parent of the Dependent Undergraduate Student
- c. S = Spouse of the Biological or Legal Adoptive Parent of the Dependent Undergraduate Student and am considered to be a parent in accordance with the instructions on the Free Application for Federal Student Aid (FAFSA) for reporting my income and assets on the FAFSA.
- d. = Other

## DEFERMENT, FORBEARANCE & REPAYMENT PLAN FORMS

StudentAid.gov contains additional deferment, forbearance, and repayment plan forms available to users for download.

The TEACH-ATS website was retired in October 2016. Functions previously available on that site are available on StudentAid.gov.

## TEACH GRANT INITIAL AND SUBSEQUENT COUNSELING

Students are able to complete a TEACH Grant Initial and Subsequent Counseling session on the StudentAid.gov Website. After login, the student may view previously submitted TEACH Grant Initial and Subsequent Counseling sessions or choose to complete a new TEACH Grant Initial and Subsequent Counseling session. A demo of the TEACH Grant Initial and Subsequent counseling is available outside login.

### BUSINESS RULES FOR TEACH GRANT INITIAL AND SUBSEQUENT COUNSELING

1. Students must complete TEACH Grant Initial and Subsequent Counseling each Award Year that they are receiving a TEACH Grant.
2. Students must complete TEACH Grant Initial and Subsequent Counseling before they can sign their TEACH Grant Agreement to Serve or Repay (Agreement).
3. A system generated response is sent to schools for TEACH Grant Initial and Subsequent Counseling records using the existing message class CRACXXOP (XX=Award year) with a value on the `<CounselingType>` tag defined as 'TEACHCounseling'.
4. TEACH Grant Initial and Subsequent counseling completion information is available on the COD Web Counseling Search page under the Person tab.

## TEACH AGREEMENT TO SERVE OR REPAY

The TEACH Agreement To Serve or Repay (Agreement) is the approved promissory note for TEACH grants for all schools. The Agreement can only be submitted electronically via the StudentAid.gov Website. A demo and Preview Read-only version of the Agreement is available outside login.

### BUSINESS RULES FOR ALL AGREEMENTS

1. A TEACH Agreement to Serve or Repay (Agreement) is an agreement made by the student to meet the teaching service requirements of the TEACH Grant Program, and the student's promise to repay any TEACH Grant that is converted to a Direct Unsubsidized Loan if the student does not complete the required teaching service or otherwise does not meet the requirements of the TEACH Grant Program.
2. Students must complete an Agreement each Award Year that they are receiving a TEACH Grant.
3. An Agreement must be signed by the student before disbursing a TEACH grant
  - a. An Agreement must be on file on the COD System before actual disbursements can be accepted by COD for associated grants.
4. When students complete an Agreement, an Agreement Acknowledgement is sent to the school the student selected while completing the Agreement.

## TEACH GRANT EXIT COUNSELING

TEACH Grant Exit Counseling is available on StudentAid.gov. Students are required to complete a TEACH Exit Counseling session on the StudentAid.gov Website. A demo of the counseling is available outside login. A TEACH Grant Counseling report is available on the COD Website.

### BUSINESS RULES FOR TEACH GRANT EXIT COUNSELING

1. Students must complete the TEACH Grant Exit Counseling session upon withdrawing or graduating from the school where they received their TEACH Grant.
2. TEACH Grant Exit Counseling provides information about fulfilling the TEACH Grant service obligation and explains the terms and conditions that apply if the TEACH Grant is converted to a Direct Unsubsidized Loan.
3. The StudentAid.gov user must login and complete all topics for the counseling session to be considered complete and completion information to be available in COD.
4. COD will notify the school(s) selected by a user in the TEACH Grant Exit Counseling completion process when the user successfully completes the TEACH Grant Exit Counseling session.
5. A TEACH Grant Exit counseling completion information is available on the COD Web Counseling Search page under the Person tab.
  - a. Authorized users are able to download the counseling search results as a .csv file after the search results are returned.

## Pell Grant Award and Disbursement Process

### PELL GRANT CORRECTION EDITS CAN BE TREATED AS REJECTS

The COD System provides an option for the processing of Pell Grant data that allows schools to choose if they want to accept corrections to the Pell Grant data they submit to the COD System, or if they would rather have the data rejected.

#### **BUSINESS RULES**

1. Schools may select an option to have Pell Grant data that fails edits rejected rather than receive corrections for that data.
2. This option applies to all edits that are marked as an Edit Type C/R in Volume 2, Section 4 – Edits.
3. Both corrections and rejections utilize the same edit number to indicate which edit was set; the Response Indicator differentiates between corrected and rejected.
4. When returning Response Document files, the COD System returns an edit code, the field to which it pertains, and the value submitted for rejected data.
5. When returning Response complex elements, the COD System returns an edit code, the field to which it pertains, and the corrected value.
6. Unless the School contacts the COD School Relations Center to change this option, the COD System will correct their data.
7. In order to change this option, the school must contact COD School Relations.

### REPORTING PENNIES IN THE AWARD AND DISBURSEMENT AMOUNT DATA ELEMENTS

The Award and Disbursement Amounts on the Common Record may include pennies. In the Pell Grant Program, pennies can be reported as partial dollars or two zeroes.

#### **BUSINESS RULES**

1. The data elements for Award and Disbursement Amounts on the Common Record may include two digits to the right of a decimal point.
2. When the reported amount does not include a decimal point, the COD System infers a decimal point and two zeroes to the right of the last digit reported. For example, if a school reports 1000, the COD System infers a decimal and two zeroes and stores as 1000.00.

3. In the Pell Grant Program, schools may report partial dollars (3500.32)

OR

Zeroes in the last two digits (3500.00) for Award Amount and Disbursement Amount

OR

Report the whole dollar amount only (3500) and the COD System infers the decimal point and two zeroes and stores as (3500.00).

4. The Award and Disbursement Amount data elements are:

- a. Award Amount, <FinancialAwardAmount>

- b. Disbursement Amount, <DisbursementAmount>

5. When performing edits on the Award Amount, COD calculates the Pell Award Amount using the data provided by the school. If the COD calculated Award Amount contains partial dollar amounts, COD rounds up this Award Amount to the next whole dollar amount. This is the COD calculated Award Amount. COD compares the COD calculated Award Amount to the Award Amount <FinancialAwardAmount> reported by the school.

- a. If the school reported Award Amount is less than or equal to the COD calculated Award Amount, COD accepts the Award Amount.

- b. If the school reported Award Amount is greater than the COD calculated Award Amount, COD either:

- Rejects the school reported Award Amount, if the school has selected the option to have its Pell data rejected

OR

- Corrects the school reported Award Amount, if the school has selected the option to have its Pell data corrected.

#### Example 1

When reporting a Pell Grant Award Amount of \$1250.34:

Include the decimal point and two digits to the right: 1250.34

OR

Include the decimal point and two zeroes to the right: 1250.00

OR



Omit the decimal point and report the whole dollar amount only: 1250

Then, the COD System infers a decimal point and two zeroes and stores 1250.00.

Do **not** submit 125000 as the COD System infers a decimal and stores this submission as 125000.00.

Example 2 Scenarios where COD will not round to the nearest dollar:

If the Pell Award is \$9142.50 and the Additional Eligibility Indicator is set to 'true' and the school submitted \$9143.00 COD would correct the award down to 150% Pell Max Amount of \$9142.50.

Award Error	
Field	FinancialAwardAmount
Edit number	172
Description	INCORRECT AWARD AMOUNT WHEN ADDITIONAL ELIGIBILITY INDICATOR IS "TRUE"
Edit status	Corrected
Field value	9143
Corrected value	9142.5
<a href="#">VIEW RECORD</a> <a href="#">VIEW RESPONSE</a>	

Figure 1 – Award and Disbursement Amount Data Elements

## ESTABLISHING PELL GRANT AWARD INFORMATION

Award information submitted to the COD System for a student from a specific Attended School applies to the entire award year for that student.

### BUSINESS RULES

1. The COD System establishes only one set of Pell Grant Award information per Attended School Routing ID per student per award year.
  - a. The first submission of Award information that is accepted by the COD System establishes the Pell Grant award for the student for that Attended School Routing ID for that award year.
  - b. Subsequent submissions of Award information for that student, Attended School Routing ID, and award year are treated as an update to the original accepted data.
2. Pell Grant Award Amounts that establish the award cannot be zero on first submission.
3. The COD System will calculate the Scheduled Grant for fulltime eligibility.

4. Beginning with the 2024-25 Award Year the COD System uses the FPS Transaction Number submitted with the Award Information to pull the Pell Eligibility Flag, Student Aid Index, Max Pell Indicator, Minimum Pell Indicator, Children of Fallen Heroes Indicator, Iraq Afghanistan Service Grant Indicator to assist in calculating the Scheduled Grant.
5. The COD System uses the Cost of Attendance (COA) submitted on the common record to assist in calculating the Scheduled Grant (Scheduled Federal Pell Grant (SFPG) amount.
6. Beginning with the 2024-25 Award Year the COD System will use the Pell determining components from the FPS Transaction Number and the COA to determine the Scheduled Grant. Refer to the “Calculating Pell Grant Scheduled Awards” topic in this Implementation Guide for more information
7. The COD System uses the Scheduled Grant and the student’s percentage of Eligibility Used at any other Attended campus(es) to determine the student’s maximum Award Amount for the entire award year.
8. The FPS Transaction Number reported in the Award information applies to all Pell Grant transactions for that award year.

**FPS Transaction Number:**

The COD System uses the FPS Transaction Number to pull the Pell Eligibility Flag, Student Aid Index (SAI), Max Pell Indicator, Minimum Pell Indicator, Children of Fallen Heroes Indicator, and Iraq Afghanistan Service Grant Indicator.

9. The COD System uses a formulaic Scheduled Award calculation to calculate the Scheduled Award and validate the Award Amounts.
10. If the Award Amount for the entire award year reported exceeds the maximum Award Amount determined by the COD System, COD either corrects or rejects the Award Amount depending on the school’s selected option.
  - a. If rejected, the School must determine the correct award amount, and/or select a different FPS Transaction Number containing the correct Pell Eligible components and resubmit to the COD System.
11. If the Award information for a student changes, the School must submit the change to the COD System within 30 days of the date the School becomes aware of the change, or by the established Pell Grant reporting deadline, whichever comes first.

Refer to the Pell Correction Edits to Be Treated as Rejection Edits topic for more information.

12. The COD System does not use the Award information to establish or adjust a school’s Pell Grant Current Funding Level. Only actual disbursement information submitted with a Disbursement Release Indicator set to “true” can change a school’s Pell Grant CFL.
13. The COD System does not accept **new** Award information or **increases** to Award information after the established student award data submission deadline (September 30, 2026, for the 2025-26 Award Year) or if a school is confirmed closed out unless:
  - a. The school has been granted extended processing from this deadline

OR

Is resubmitting an award and/or disbursement for a POP situation

OR

Reducing an award or disbursement

OR

Flagging the Coronavirus Indicator including any non-financial changes.

Schools can request Extended Processing via the Request Reopen/Extended Processing link on the [COD Website](#).

14. The COD System always accepts Award and Disbursement decreases until the funding year is cancelled without the need to request extended processing.

#### **Pell Processing Deadline:**

For the 2024-25 Award Year, the Pell established data submission (closeout) deadline is September 30, 2025.

15. The COD System requires the `<StudentEligibilityCode>` tag on all Pell Grant originations.
16. The following data elements are required for a Pell Grant Award, if the Student Eligibility Code is 01, 11, or 12:
  - a. Ability to Benefit Test Code
  - b. Ability to Benefit Test Administrator Code
  - c. Ability to Benefit Completion Date
17. Missing requirements for ATB State Code The following data elements are required for a Pell Grant Award, if the Student Eligibility Code is 03:
  - a. Ability to Benefit Completion Date
  - b. Ability to Benefit State Code
18. A complete address is required to establish a Pell Grant award. However, these tags are not required to be submitted on the incoming record if it can be pulled from the FPS or the COD database.
  - a. The data elements for a complete address are:

- Address, <AddressLine>
- City, <AddressCity>
- State/Province Code

b. For domestic addresses <StateProvinceCode>

- Postal Code, <PostalCode>
- Country Code, <AddressCountryCode> (for international addresses only)

c. If any of the address fields are blank, COD will attempt to pull these data elements from FPS or the COD database.

d. The COD System will pull the student address for the highest FPS transaction number for the most recent award year.

e. If a complete address cannot be found on FPS or the COD database, the Person and Award record will reject (Edit 021).

- The school must resubmit the record with a complete address.

f. If a complete address is found on FPS or the COD database, the record will accept and the school will receive a warning message that a complete address exists on COD (Edit 120).

19. An eligible Citizenship Status is required to originate a Pell Grant on COD.

- a. For Pell awards, the valid values for Citizenship Status Code are 1 (US Citizen) and 2 (Eligible Non-Citizen). If an invalid value is submitted, COD will reject the origination.
- b. If a Citizenship Status Code is provided in the common record, COD will accept and store a valid value.
- c. If a Citizenship Status Code is not provided in the common record, COD will attempt to pull the value from FPS.
  - If a valid value cannot be pulled from FPS, COD will reject the origination.

## CALCULATING PELL GRANT SCHEDULED AWARDS

Beginning with the 2024-25 Award Year, the COD System will use a formulaic process to calculate the Scheduled Federal Pell Grant (SFPG) using the fields listed below. The COD System will use data from the necessary fields on the FPS Transaction Number identified on the common record. The COD System will utilize the set maximum and minimum Pell amounts for the award year published by the Department of Education.

<i>Fields Used to Calculate SFPG</i>	
Source:	Field:
FPS Transaction Data	Pell Eligibility Flag
	Student Aid Index (SAI)
	Max Pell Indicator
	Minimum Pell Indicator
	Children of Fallen Heroes Indicator
	Iraq Afghanistan Service Grant Indicator
Common Record Data	Cost of Attendance (COA)

Table 45

### Business Rules

- The COD System will calculate an SFPG if the minimum data elements are available:
  - Student Aid Index (SAI)
  - Pell Eligibility Flag = Yes
  - Cost of Attendance (COA)
- The COD System will recalculate SFPG every time a Pell origination or maintenance record is submitted.
- The SFPG will be rounded to the nearest five-dollar increment, with the exception if the COA is less than the calculated SFPG.

**CALCULATION PROCESS** – The COD System calculates the Scheduled Award by evaluating the data elements **in the following order**:

- STEP 1:** Is there a Max Pell Indicator equal to null (blank)?
  - If yes, there is no value in the Max Pell Indicator, the COD System goes to **STEP 2**
  - If no, there is a valid value in the Max Pell Indicator, the COD System goes to **STEP 5**

2. **STEP 2:** Is the SAI less than or equal to zero?
  - a. If yes, the SAI is less than or equal to zero the COD System goes to **STEP 5**
  - b. If no, the SAI is greater than zero, the COD System proceeds to **STEP 3**
3. **STEP 3:** Regardless of SAI, is the Iraq Afghanistan Service Grant Indicator "Eligible for IASG" OR "Eligible Due to Grandfathering"?
  - a. If the Iraq Afghanistan Service Grant Indicator has an eligible value, the COD System proceeds to **STEP 5**
  - b. If the Iraq Afghanistan Service Grant Indicator has a value of "Not Eligible for IASG" or is blank the COD System proceeds to **STEP 4**
4. **STEP 4:** Regardless of SAI, is the Children of Fallen Heroes Indicator "Eligible for CFH" OR "Eligible Due to Grandfathering"?
  - a. If the Children of Fallen Heroes Indicator has an eligible value, the COD System proceeds to **STEP 5**
  - b. If the Children of Fallen Heroes Indicator has a value of "Not Eligible for CFH" or is blank the COD Systems proceeds to **STEP 6**
5. **STEP 5:** Does the COA exceed the maximum published Pell?
  - a. If yes, **the Scheduled Award equals the maximum published Pell** and the calculation ends
  - b. If no, then **the Scheduled Award equals the COA** with cents truncated, no rounding takes place, and the calculation is complete.
6. **STEP 6:** Is the Min Pell Indicator equal to null?
  - a. If yes, the COD System calculates a "Temporary Scheduled Award" (TSA) by subtracting the SAI from the maximum published Pell amount and proceeds to **STEP 7**
  - b. If no, then the COD System proceeds to **STEP 9**.
7. **STEP 7:** [Rounding Rules] Does the TSA end in 0 or 5?
  - a. If yes, the COD system proceeds to **STEP 8**
  - b. If no, does the TSA end in 3, 4, 8 or 9?
    - i. If yes, the COD System rounds the TSA up to the nearest \$5 increment and proceeds to **STEP 8**
    - ii. If no (ends in 1,2,6 or 7), the COD System rounds the TSA down to the nearest \$5 increment and proceeds to **STEP 8**

8. **STEP 8:** Is the TSA greater than COA?
  - a. If yes, the **Scheduled Award equals the COA** with any cents truncated, no rounding takes place, and the calculation is complete.
  - b. If no, **the Scheduled Award equals the TSA** and the calculation is complete.
9. **STEP 9:** Does the COA exceed the minimum published Pell?
  - a. If yes, the **Scheduled Award equals the published minimum Pell**, and the calculation is complete.
  - b. If no, **the Scheduled Award equals the COA** with any cents truncated, no rounding takes place, and the calculation is complete.

## MAXIMUM PELL ELIGIBILITY FOR DEPENDENTS OF DECEASED VETERANS WHO DIED IN IRAQ OR AFGHANISTAN AFTER SEPTEMBER 11, 2001

From June 2009 through the 2023-24 Award Year, Pell eligible students who were dependents of a veteran who died as a result of service in Iraq or Afghanistan after September 11, 2001 became eligible for the maximum Pell award as if they had a zero Expected Family Contribution (EFC). Please consult the 2023-24 COD Technical Reference if guidance on prior year processing is needed.

**Note:** The “Post 9/11 Deceased Veteran Dependent Indicator” is still visible on the COD web but only valid for award years 2009-10 through 2023- 24

## MAXIMUM PELL ELIGIBILITY UNDER THE CHILDREN OF FALLEN HEROES SCHOLARSHIP ACT

Under certain conditions, an otherwise Federal Pell Grant eligible student whose parent or guardian died in the line of duty while actively serving as a police officer, firefighter, or other public safety officer, may receive a maximum Pell Grant award.

The Children of Fallen Heroes (CFH) Indicator was added to Pell Grant award pages for Award Years 2018-19 and 2019-20 and allowed schools to certify a student's increased eligibility for Pell under this provision on the COD website. From 2020-21 through 2023-24 the CFH Indicator in COD was populated from the FAAs certification on FAA Access to CPS Online. For 2024-25 and forward the CFH indicator in COD is populated based on the FAAs certification of eligibility in the FAFSA Partner Portal.

Please consult the 2023-24 COD Technical Reference if guidance on prior year processing is needed.

## DISBURSEMENT SEQUENCE NUMBER REQUIRED ON ALL DISBURSEMENTS

A Disbursement Sequence Number must be reported for all disbursements. This is an indicator of a single transaction associated with a specific disbursement number.

### BUSINESS RULES

1. The Disbursement Sequence Number determines the order in which the transaction must be processed for a given Disbursement Number.
2. The Disbursement Sequence Number must be reported in an incremental, ascending order.
3. The Disbursement Sequence Number valid values range from 01-99.
  - a. Disbursement Sequence Numbers 1-65 are reported by schools.
  - b. Disbursement Sequence Numbers 66-90 are reserved for COD system-generated adjustments to actual disbursements and actual disbursement information submitted online via the [COD Website](#).
  - c. Disbursement Numbers 91-99 are reserved for DMCS Overpayments (in descending order).
4. The Disbursement Sequence Number must be reported as “01” when the Disbursement Release Indicator is set to false.
5. Duplicate Disbursement Sequence Numbers for the same Disbursement Number when the Disbursement Release Indicator is set to true are considered duplicate disbursement transactions.
6. When resubmitting a disbursement transaction that was rejected, the resubmission must use the same Disbursement Sequence Number that was rejected.
7. The `<DisbursementSequenceNumber>` tag is returned in the disbursement response complex element in all Full or Standard Common Record Responses.
8. The tag `<PreviousSequenceNumber>` is returned in all Common Record disbursement response complex elements with Disbursement Sequence Number greater than 1, including COD system-generated ND, PS, and WB responses, to indicate the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

## DISBURSEMENT RELEASE INDICATOR

The Disbursement Release Indicator is used to identify disbursements that are used to substantiate cash that has been drawn down or may lead to a change in the CFL.



## BUSINESS RULES

1. Disbursement information is submitted to the COD System with a Disbursement Release Indicator equal to true or false.
2. Disbursements with a Disbursement Release Indicator set to false do NOT change the CFL. False indicates anticipated disbursement information.
3. Disbursements with a Disbursement Release Indicator set to true may change the CFL. True indicates actual disbursement information.
4. If the Disbursement Release Indicator is omitted from the Common Record, the COD System sets it to false.

Refer to the Submitting Pell Grant Disbursement Information and Disbursement Release Indicator topic for more information.

For information on the required tags in the Disbursement complex element, refer to the topic entitled Minimum Data Elements Required for Document Processing

5. Depending on the funding method employed by the school, the COD System may accept Disbursement information with Disbursement Release Indicator set to true in advance of, on, or after the disbursement date.
6. If the Disbursement Release Indicator is set to true, the disbursement is processed only if the required tags in the Disbursement complex element are complete.
7. A Disbursement Release Indicator set to true cannot be updated to false.

Refer to the topic entitled Updating and Adjusting Pell Grant Disbursement Amounts and Dates for more information.

8. To make an adjustment to an accepted and posted actual disbursement, the Disbursement Release Indicator must be set to true.
9. The Disbursement Release Indicator can be updated, and disbursements can be generated, updated and adjusted on the COD Website.

## SUBMITTING PELL GRANT DISBURSEMENT INFORMATION AND DISBURSEMENT RELEASE INDICATOR

The COD System can accept Pell Grant Disbursement information in advance of, on, or after the disbursement date.

### BUSINESS RULES

1. Disbursement Date is defined as the date cash was credited to the student's account or paid to the student directly.
2. The COD System must accept an Award Amount greater than zero (\$0) before it can accept Disbursement information for that student.

**Note:** Award and Disbursement information can be submitted and accepted in the same transmission.

3. A student can have up to 20 disbursements (Numbers 1-20).
4. Pell Grant Disbursement Amounts cannot be zero on first submission.

**Note:** Refer to the topic entitled Updating and Adjusting Pell Grant Disbursement Amounts and Dates topic for more information.

5. The Disbursement Date may range from the date the 2024-25 Pell Maximum and Minimum amounts are published by the Department of Education until 2030-09-30 (September 30, 2030). A Knowledge Center communication will inform schools when the earliest date actual disbursement date (DRI=true) may be submitted for 2024-25.

#### **Earliest Disbursement Date:**

The earliest date on which an institution may disburse a Pell Grant, either with Federal funds or its own funds, is the date of the publication of the Pell maximum and minimum award amounts for that award year.

6. Schools will only receive Warning Edit 055 in the following conditions:
  - a. Disbursement Sequence Number = 1  
AND
  - b. Disbursement Information received and processed more than 30 days later than the Disbursement Date reported on the record,  
AND  
Disbursement Release Indicator (DRI) = true

**Note:** While Warning Edit 055 looks at actual disbursement records submitted more than 30 days after the actual Date of Disbursement, regulations require schools to submit all actual disbursements to the Department within 15 days of the actual disbursement date.

7. The COD System accepts Disbursement information for anticipated disbursements (DRI = false) and actual disbursements (DRI = true).
  - a. The required data elements for a Pell Grant **anticipated** disbursement are:
    - Disbursement Number, <Disbursement Number= " ">
    - Disbursement Amount, <DisbursementAmount>
    - Disbursement Date, <DisbursementDate>

- Disbursement Release Indicator set to false, <DisbursementReleaseIndicator = "false">
- Enrollment School Code, <EnrollmentSchoolCode>
- Payment Period Start Date, <PaymentPeriodStartDate>

The Payment Period Start Date must be contained within valid award date range. If the Payment Period Start Date is not contained within valid award date range, the COD System will reject the disbursement with edit 228. COD will bypass edit 228 if the disbursement amount is zero.

**Note:** Payment Period Start Date is required for award years 2022-23 and forward.

For award years 2021-22 and prior only required if the school is attempting to disbursement Pell/IASG during a period of ineligibility at the school.

As of October 2016, for Award Years 2016-17 through 2021-22, COD rejects all Payment Period Start dates which fall outside of the valid award date range. Invalid payment period start date ranges will be rejected with existing edit 996.

- Payment Period End Date <PaymentPeriodEndDate>

The Payment Period End Date must be contained within the valid disbursement date range. If the Payment Period End Date is not contained within the valid disbursement date range for the associated award year, the COD System will reject the disbursement with edit 228. COD will bypass edit 228 if the disbursement amount is zero.

Payment Period End Date must be greater than the Payment Start Date. If the Payment Period End Date submitted is less than or equal to the Payment Period Start Date, the COD System will reject the disbursement with Edit 227.

Note: Payment Period End date is required for award years 2022-23 and forward.

Beginning with Award Year 2022-23 and forward, COD rejects all Payment Period End dates which fall outside of the valid date ranges. Invalid payment period end date ranges will be rejected with existing edit 996.

- Published Program Length Years <PublishedPgmLengthYears>
- Published Program Length Months<PublishedPgmLengthMonths>
- Published Program Length Weeks <PublishedPgmLenghtWeeks>
- Weeks Programs Academic Year <WeeksProgramsAcademicYear>
- Special Programs <SpecialPrograms>

- Program Credential Level <ProgramCredentialLevel>
- Enrollment Status <EnrollmentStatus>
- Enrollment Intensity Percentage <EnrollmentIntensity>
- Program CIP Code <ProgramCIPCode>
- Program CIP Code Year <ProgramCIPCodeYear>

b. The required data elements for an **actual** Pell Grant disbursement are:

- Disbursement Number, <Disbursement Number= " ">
- Disbursement Amount, <DisbursementAmount>
- Disbursement Date, <DisbursementDate>
- Disbursement Release Indicator set to true, <DisbursementReleaseIndicator = true>
- Disbursement Sequence Number, <DisbursementSequenceNumber>
- Enrollment School Code, <EnrollmentSchoolCode>
- Payment Period Start Date <PaymentPeriodStartDate>

**Note:** Payment Period Start Date is required for award years 2022-23 and forward.

For award years 2021-22 and prior, only required if the school is disbursing during a period of ineligibility at the school.

- Payment Period End Date <PaymentPeriodEndDate>

The Payment Period End Date must be contained within the valid disbursement date range for the associated award year. If the Payment Period End Date is not contained within the valid disbursement date range, the COD System will reject the disbursement with edit 228. COD will bypass edit 228 if the disbursement amount is zero.

Payment Period End Date must be greater than the Payment Start Date. If the Payment Period End Date submitted is less than or equal the Payment Period Start Date, the COD System will reject the disbursement with Edit 227.

**Note:** Payment Period End date is required for award years 2022-23 and forward.

- Published Program Length Years <PublishedPgmLengthYears>
- Published Program Length Months<PublishedPgmLengthMonths>
- Published Program Length Weeks <PublishedPgmLenghtWeeks>
- Weeks Programs Academic Year <WeeksProgramsAcademicYear>
- Special Programs <SpecialPrograms>
- Program Credential Level <ProgramCredentialLevel>
- Enrollment Status <EnrollmentStatus>
- Enrollment Intensity Percentage <EnrollmentIntensity>
- Program CIP Code <ProgramCIPCode>
- Program CIP Code Year <ProgramCIPCodeYear>

8. The valid values for Program Credential Level are:

- a. 1: Undergraduate certificate or diploma program
- b. 2: Associate's degree
- c. 3: Bachelor's degree
- d. 4: Post Baccalaureate certificate
- e. 5: Master's degree
- f. 6: Doctoral degree
- g. 7: First Professional degree
- h. 8: Graduate/Professional certificate
- i. 99: Non-credential programs (preparatory coursework/teacher certification)

9. The COD System shall validate that only one of the three tags `<PublishedProgramLengthYears>`, `<PublishedProgramLengthMonths>`, or `<PublishedProgramLengthWeeks>` is submitted on an incoming record. If more than one is submitted, the system will reject with edit 202.
10. The `<WeeksProgramsAcademicYear>` tag is only valid for the 2017-18 Award Year and forward.
- a. The Weeks Programs Academic Year is the Title IV Academic Year and must be greater than or equal to 26. The COD system will reject the record with edit 209 if the Weeks Programs Academic Year is less than 26.
  - b. Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` must be submitted when `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` is submitted, or the `<SpecialPrograms>` is set to "Preparatory Coursework Graduate Professional Program."
  - c. The `<WeeksProgramsAcademicYear>` tag will be ignored if submitted with the `<PublishedPgmLengthYears>` and will not be stored.
  - d. The `<WeeksProgramsAcademicYear>` tag is optional when submitting changes to a disbursement.
  - e. Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` must be submitted when changing the Special Program to 'Preparatory Coursework Graduate Professional Program' or submitting `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` when `<PublishedPgmLengthYears>` was previously submitted for the disbursement.
11. The Special Programs `<SpecialPrograms>` is only valid for the 2017-18 Award Year and forward. If the tag is submitted it must include one of the following valid values for Special Programs:
- a. 'A' – Selective Admission Associated Progra,
  - b. 'B' – Bachelor's Degree Completion Program
  - c. 'N' – Not Applicable
  - d. 'P' – Preparatory Coursework Graduate Professional Program
  - e. 'T' – Non-Credential Teacher Certification Program
  - f. 'U' – Preparatory Coursework Undergraduate Program
12. The COD System requires the Enrollment Status, Enrollment Intensity Percentage and at least one CIP code on Pell Disbursements
- `<EnrollmentStatus>`
- a. `<EnrollmentStatus>` For Pell and Iraq & Afghanistan Service Grant the enrollment status for the period for which the disbursement is being made.

b. The valid values for `<EnrollmentStatus>` are:

- i. 'F' - Full Time = 1.00
- ii. 'Q' - Three-quarters Time = 0.75
- iii. 'H' - Half Time = 0.50
- iv. 'L' - Less than half time

c. `<EnrollmentStatus>` is optional when submitting changes to disbursements and should only be resubmitted if the original submission was incorrect.

`<EnrollmentIntensity>`

d. `<EnrollmentIntensity>` The Enrollment Intensity Percentage of the disbursement.

e. The valid values for `<EnrollmentIntensity>` are:

- i. Whole number between 0-100

f. `<EnrollmentIntensity>` is optional when submitting changes to disbursements and should only be resubmitted if the original submission was incorrect.

`<ProgramCIPCode>`

g. The valid CIP codes can be found at the following location: <https://nces.ed.gov/ipeds/cipcode/default.aspx?y=56>

h. The COD System will allow a maximum of three occurrences for the CIP Code field for Award Year 2024-25 and forward.

i. The COD System will store each CIP Code value once when duplicate values are received with warning edit 131.

j. The COD System will reject an invalid CIP Code with edit 204.

k. A valid `<ProgramCIPCode>` must be submitted with a disbursement upon origination.

l. `<ProgramCIPCode>` must be submitted within the CIP tag complex element for Award Year 2025-26 and forward

`<ProgramCIPCodeYear>`

m. The COD System will reject an invalid CIP Code Year with edit 204.

- n. A valid `<ProgramCIPCodeYear>` must be submitted with a disbursement upon origination.
- o. `<ProgramCIPCodeYear>` is optional when submitting maintenance to a disbursement and should only be resubmitted if the original submission was incorrect.

Beginning with Award Year 2022 – 23 and forward, COD will accept an optional Incarcerated Student Indicator that is used to identify if the student is incarcerated at the disbursement level. At an Award level, the Invalid Incarcerated Student Indicator will be rejected with existing edit 996.

- p. `<IncarceratedStudentIndicator>` The COD system shall accept Incarcerated Student Indicator for Pell Disbursements. This field is optional when submitting Pell Disbursements.
13. The COD System shall validate that the value in the `<WeeksProgramsAcademicYear>` field is greater than 26. If it is less than 26 weeks the COD system will reject with edit 209.
  14. When reporting a disbursement adjustment to the COD System, replacement Disbursement Amounts must be reported rather than the amount of the reduction or increase to the existing Disbursement Amount.
  15. Pell Grant CFL changes, if applicable, are driven by:
    - a. Disbursement Date, `<DisbursementDate>`
    - b. Disbursement Release Indicator set to true, `<DisbursementReleaseIndicator = true>`
  16. Depending on the funding method employed by the school, the COD System may accept Disbursement information in advance of, on, or after the disbursement date.
  17. Schools designated as Advance Funded may submit a Disbursement Release Indicator set to true up to 7 calendar days before the Disbursement Date.
    - a. If the current date exceeds 7 calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with error code 051.
    - b. If the current date is within seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement.



**Example: Schools Participating in Advance Funded**

Date Sent	Disbursement Number	Sequence Number	Disbursement Date	Disbursement Amount	Disbursement Release Indicator	Result
09/1/2017	1	1	09/08/2018	\$1500.00	true	Posted on 9/1/2017 (7 calendar days before disbursement date)
02/01/2018	2	1	02/08/2018	\$1500.00	true	Posted on 2/1/2018 (7 calendar days before disbursement date)
03/01/2018	3	1	06/01/2018	\$500.00	true	Disbursement rejected; School must resubmit Disbursement information within 7 calendar days of Disbursement Date.

Table 46

18. Schools designated as Cash Monitoring 1 (HCM1) review status by the School Participation Team may submit a Disbursement Release Indicator set to true up to 7 calendar days before the disbursement date.

- a. If the current date exceeds seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with error code 051.
- b. If the current date is within seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement.

**Example: Schools Designated as Cash Monitoring 1 (HCM1)**

Date Sent	Disbursement Number	Sequence Number	Disbursement Date	Disbursement Amount	Disbursement Release Indicator	Result
08/15/2018	1	1	09/08/2018	\$1500.00	true	Disbursement rejected; School must resubmit Disbursement information within 7 calendar days of Disbursement Date.
02/01/2018	2	1	02/07/2018	\$1500.00	true	Posted on 2/1/2018 (7 calendar days before disbursement date)

Table 47

19. Schools designated as in the Reimbursement or Cash Monitoring 2 (HCM2) review status can submit a Disbursement Release Indicator set to true if the current date is equal to or after the Disbursement Date.

- a. If the current date is before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with error code 051.
- b. If the current date is equal to or after the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement upon review of documentation by the School Participation Team.

**Example: Schools Designated as Reimbursement or Cash Monitoring 2 (HCM2)**

Date Sent	Disbursement Number	Sequence Number	Disbursement Date	Disbursement Amount	Disbursement Release Indicator	Result
09/06/2017	1	1	09/08/2017	\$1500.00	true	Disbursement rejected; School must resubmit Disbursement information on or after the Disbursement Date.
02/07/2018	2	1	02/07/2018	\$1500.00	true	Posted on 2/7/2017 (On or after disbursement date, upon review of documentation by SPT)

Table 48

## UPDATING AND ADJUSTING PELL GRANT DISBURSEMENT AMOUNTS AND DATES

Disbursement Amounts and Dates must be changed using the same disbursement number, rather than reporting a new disbursement number.

### BUSINESS RULES

1. To change a Disbursement Amount and/or Disbursement Date, the following data elements are required:
  - a. Disbursement Release Indicator, <DisbursementReleaseIndicator = "">
  - b. Disbursement Number, <Disbursement Number= "">
  - c. Disbursement Sequence Number, <DisbursementSequenceNumber>
  - d. Disbursement Amount, <DisbursementAmount>

## e. Disbursement Date, &lt;DisbursementDate&gt;

2. When changing a disbursement already reported to COD, the same Disbursement Number must be reported.
3. When changing a disbursement with a Disbursement Release Indicator = false, the Disbursement Sequence Number must be set to
4. When changing a disbursement that already has a Disbursement Release Indicator = true, the Disbursement Sequence Number must be unique. The next sequential Disbursement Sequence Number must be reported.
5. Disbursement Sequence Numbers for a specific Disbursement Number must be used in sequential order within the range of 1-65.
6. The Previous Sequence Number for a specific Disbursement Number is returned on all disbursement responses with Disbursement Sequence Number greater than 1 and can be used to determine the next Disbursement Sequence Number.
7. When changing the Disbursement Amount, replacement Disbursement Amounts must be reported, rather than an adjustment to the existing Disbursement Amount.

Schools cannot report a negative disbursement amount on a Common Record document. A replacement disbursement amount MUST be reported.

8. Disbursement Date is always the date the cash was credited to the student's account or paid to the student directly for this specific Disbursement Number (Disbursement Sequence Number = 1). Disbursement Date is NOT the transaction date of the adjustment to the disbursement (Disbursement Sequence Number not equal to 1).
9. Schools must submit adjustments to actual disbursements (Disbursement Sequence Number not equal to 1) within 15 days of the transaction date.

Although it is not required to report the transaction date to the COD System, schools are advised to keep it for their records.

10. Pell Grant disbursement amounts can be adjusted to \$0.

### Example

The following table illustrates the use of Disbursement Sequence Number and replacement Disbursement Amounts when making a change to an existing disbursement:

Disbursement Number	Sequence Number	Disbursement Date	Disbursement Amount	Accepted YTD Amount
1	1	09/01/2018	\$2000.00	\$2000.00
2	1	01/02/2018	\$2000.00	\$4000.00
2	2	01/02/2018	\$1500.00	\$3500.00

Table 49

## PROCESSING SYSTEM-GENERATED PELL RESPONSES

COD system-generated Responses of Document Type ND (Negative Disbursement) are generated for several situations, including Verification Status Code W, Negative Pending Records, Potential Overaward Process, and Pell LEU deobligation reductions.

### BUSINESS RULES

1. A Response Document of Document Type ND contains a system-generated Document ID.
2. The Response indicates the Disbursement Number to which the downward adjustment applies and a COD system-generated Disbursement Sequence Number between 66 and 90.
3. The Response contains the `<PreviousSequenceNumber>` indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.

Refer to the Deobligation of Funds Due to Verification Status W, Negative Pending Records, Potential Overaward Process, and Pell LEU sections for more information.

## REPORTING VERIFICATION STATUS CODE

Valid values for the Verification Status Code tag are V, W, and S.

### BUSINESS RULES

1. The COD System valid values for the Verification Status Codes are:
  - a. V Verified
  - b. W Without Documentation
  - c. S Selected, but Not Verified
2. The Verification Status Code is required from a business standpoint but is an optional tag from a technical standpoint.
3. The Verification Status Code tag may be omitted from the Common Record only if the student is not selected for verification by FPS or if a selected FPS transaction was received by the school after the student was no longer enrolled.

The verification status codes are V, W, and S. The conditions under which each verification status code should be used are as follows:

## BUSINESS RULES (CONT'D)

### **“V” is used when...**

The school has verified the student.

### **“W” is used when...**

The student was selected for verification by the FAFSA Processing System (FPS) or by the school, and the school chose to pay a first disbursement of the Pell Grant without documentation as provided for in the regulations at 34 CFR 668.58. For students with a Verification Status Code of W, the COD System only accepts one disbursement with a Disbursement Amount up to 50% of the student's Scheduled Grant.

**Note:** The W code must be updated to V once verification is complete. If the code is not updated, the Pell Grant will be reduced to a zero-dollar amount (\$0.00) when Federal Student Aid performs a global reduction of disbursements for awards with a W status.

### **“S” is only used when...**

The FPS selected the student for verification, but the school was not required to verify the student in accordance with the exclusions from verification provided for in the regulations at 34 CFR 668.54(b). These exclusions are outlined in the Application and Verification Guide of the Federal Student Aid Handbook posted on the Information for Financial Aid Professionals (Knowledge Center) Website ([Federal Student Aid Handbook | Knowledge Center](#)).

**Note:** A school does not need to submit a verification status code and should leave the field blank if the student was not selected for verification or if a selected transaction was received by the school after the student was no longer enrolled.

Schools can submit a null tag (nil = “true”) to remove or delete a Verification Status Code. Schools may not update a previously accepted Verification Status Code value of V, W or S to “blank” via the COD Web. End of entry edits will prevent a school from doing this, and any changes to a null tag (nil = “true”) may only be submitted via batch processing. Refer to the Empty (Blank) and Null Tags section of this Implementation Guide for additional information.

4. School reported Verification Status Code is compared against the verification indicator on the highest FPS transaction number for that student and that award year.
5. Schools may receive two tags on the Common Record Response based upon how the school reported Verification Status Code compares to the information on file with FPS.

The FPS Verification Indicator and Highest FPS Transaction Number tags were implemented for the 2024-25 Award Year and forward. For more information, please refer to Volume 2, Section 3 – Common Record Layout of this technical reference.

- a. FPS Verification Indicator, <FPSVerificationIndicator>, is returned if the school submits a Verification Status Code of blank or W and the FPS verification indicator is Y on any FPS transaction for that award year.
  - b. Highest FPS Transaction Number, <HighestFPSTransactionNumber>, indicates the highest FPS transaction number on file for the student for that award year. The tag is returned if any transaction number on file with FPS is greater than the school reported transaction number.
6. The COD System generates a monthly Pell Verification Status Report that consists of those students with actual disbursements that have been selected for verification but for whom no verification activity has been reported to COD by the school.

**Pell Verification Status Report:**

For more information please refer to Volume 6, Section 7 – COD Reports of this Technical Reference.

## DEOBLIGATION OF FUNDS DUE TO VERIFICATION STATUS “W”

Upon request by FSA, the COD System can send warning messages and generate CFL decreases for schools that have students with Verification Status Codes of W (Without Documentation).

### BUSINESS RULES

1. Upon request by FSA, the COD System produces and sends a list of students at the School with a Verification Status of W and sends a warning to the School that it must take action.
  - a. The COD System lists the students with a Verification Status of W alphabetically by Last Name, by Attended School in the Reconciliation Report.
    - i. The Reconciliation Report is sent to the school’s SAIG mailbox using the following message class: PGRC25OP
  - b. The text warning message indicates a date on which COD will reduce the students’ YTD disbursements to zero (\$0.00) if the School has not reported to COD an acceptable Verification Status Code for each student.
    - i. This warning message is sent to the school’s SAIG mailbox using the following message class: PGTX25OP.
    - ii. Appropriate award year is included in the text message.
2. After the date indicated in the warning message upon request by FSA, the COD System reduces all disbursements for students with a Verification Status of W to zero (\$0.00) and generates negative disbursements, these are sent to the school in a response document type of ND.

- a. The COD system-generated disbursements with a document type ND contain a Disbursement Sequence Number between 66 – 90.
  - b. The COD system-generated Response with a document type ND contains the `<PreviousSequenceNumber>` tag indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.
3. The School's CFL is decreased as a result of the COD system-generated ND Response.
  - a. The COD System sends a text message to the School indicating the CFL decrease.
    - i. This text message is sent to the school's SAIG mailbox using the following message class: PGTX25OP.
    - ii. Appropriate award year is included in the text message.
  - b. The COD System sends a revised Electronic Statement of Account report to the school to reflect the CFL decrease.
4. For the 2009-10 Award Year and forward, the COD System will reject all Pell Award originations, award increases, change records which change the verification status of the Pell Award to W, disbursements, or disbursement increases for awards with verification status of W if the record is submitted after the Verification W cut-off date.
  - a. If a school submits a new Pell Award origination with a verification status of W for the 2024-25 Award Year Verification W cut-off date, the COD System will reject with Edit 145.
  - b. If a school submits an award amount increase to a Pell Award with a verification status of W after the Verification W cut-off date, the COD System will reject with Edit 145.
  - c. If a school attempts to change the existing verification status of a Pell Award to a value of W after the Verification W cut-off date, the COD System will reject with Edit 145.
  - d. If a school submits a new Pell disbursement or disbursement increase for a Pell award with a verification status of W after the Verification W cut-off date, the COD System will reject with Edit 146.
    - i. The date the batch is received by COD will be compared with the Verification W cut-off date.
    - ii. Downward disbursements will continue to be accepted by the COD System after the Verification W cut-off date.
5. For the 2010-11 Award Year and forward, once COD reduces a disbursement to zero due to Verification Status W, the COD System will allow changes to existing Disbursement information submitted with a Verification Status of W for that Award until the Verification-W cut-off date.

6. To increase the disbursements from zero, the school must resubmit the disbursement information with the next sequential Disbursement Sequence Number and acceptable Verification Status Code of V, S or blank.

## NEGATIVE PENDING RECORDS

If an update to Pell Grant Award information produces an Award Amount that is less than the total of all accepted and posted Disbursement Amounts for that award, the COD System creates a Negative Pending Record for that award. The Response contains the Warning Edit 040 and the Negative Pending Amount tag.

## BUSINESS RULES

1. If the total of all accepted and posted Disbursement Amounts (Disbursement Release Indicator = true) exceed the Award Amount for a Pell Grant Award, the COD System creates a Negative Pending Record for that award.
2. The COD System includes the Negative Pending Amount tag in the Response.
  - a. The Negative Pending Amount tag indicates the difference between the sum of all accepted and posted Disbursement Amounts and the Award Amount.
3. The COD System allows a Negative Pending Record to exist for 30 calendar days.
4. The COD System does not accept Disbursement information with a Disbursement Release Indicator of true that would result in an increase to the total accepted disbursements for an award with a Negative Pending Record at COD.
5. Within 30 calendar days of receiving a Negative Pending Amount on the Response, the school must either:
  - a. Increase the Award Amount by at least the Negative Pending Amount. Please see Example 1.

OR

  - b. Decrease the Disbursement Amount by at least the Negative Pending Amount. Please see Example 2.
6. If within 30 calendar days the COD System does not receive a change to the Award Amount or Disbursement Amount that meets the conditions above, COD reduces the disbursement by an amount equal to the Negative Pending Amount and creates a negative disbursement. The system-generated Negative Disbursement is sent to the school in a Response with Document Type ND.
7. The COD system-generated Negative Disbursement Response contains
  - a. Disbursement Number



- b. Disbursement Date (original disbursement date)
- c. A COD system-generated Disbursement Sequence Number between 66 and 90
- d. The `<PreviousSequenceNumber>` tag indicating the previous accepted Disbursement Sequence Number on the COD System for this Disbursement Number.
- e. Adjusted Disbursement Amount

#### Example 1

The Pell Award = \$1200 and the Initial accepted Disbursement = \$1700. Thus, the Negative Pending Amount is \$500.

If the appropriate response is for the school to increase the Award Amount, the changed Award Amount must be \$1700 or greater.

#### Example 2

The Pell Award = \$1200 and the Initial accepted Disbursement = \$1700. Thus, the Negative Pending Amount is \$500.

If the appropriate response is for the school to decrease the Disbursement Amount, the adjusted Disbursement Amount must be \$1200 or less.

## CONCURRENT ENROLLMENT

A student may not receive a Pell Grant at two or more schools concurrently. When more than one Attended School reports disbursements for a student and the enrollment dates are within 30 calendar days of each other, the COD System identifies a potential concurrent enrollment and sends a warning message to all schools involved.

Students cannot receive Pell Grants for the same period of time from two Attended Schools concurrently. See CFR 690.11.

## BUSINESS RULES

1. A student may not receive a Pell Grant at two or more schools concurrently.
2. When the COD System receives disbursement information for a student from more than one Attended School for the same award year, the COD System checks whether `<EnrollmentDate>` tags submitted by the schools are within 30 calendar days of each other.
3. If a potential concurrent enrollment situation exists, the COD System sends the school that submitted the disbursement information

Warning Edit 069 on their Response document.

4. The COD System sends the school that submitted the disbursement information and all other schools with accepted disbursement information in COD for the student and that award year, a Multiple Reporting Record (MRR)

## DEOBLIGATION DUE TO PELL LEU EXCEEDING 600%

A student's Pell LEU may not exceed 600%. As a part of regular disbursement processing, the COD System will correct/reject disbursements which cause the student's Pell LEU to exceed 600%.

If a student's Pell LEU increases due to changes to a student's Cost of Attendance or Pell eligibility determining data elements as a result of updating the FPS transaction number, that student's disbursements may exceed the award amount, and may be eligible for reduction as a part of the Pell LEU deobligation process.

### BUSINESS RULES

1. If a recipient's Pell LEU exceeds 600% without disbursement information being submitted to COD, the Pell grant may be included as a part of the Pell LEU deobligation process.
2. If a recipient's Pell LEU exceeds 600% due to a change to the Scheduled Award amount, the Pell grant and may be eligible for reduction as a part of the Pell LEU deobligation process.
3. If a recipient's Pell LEU exceeds 600% due to a change to the Student Aid Index (SAI), Max Pell Indicator, Minimum Pell Indicator, Iraq Afghanistan Service Grants Indicator or Pell Eligibility Flag as a result of updating the FPS transaction number may be eligible for reduction as a part of the Pell LEU deobligation process.
4. If a recipient's Pell LEU exceeds 600% due to a change to the or their Cost of Attendance (COA) the Pell Grant may be eligible for reduction as a part of the Pell LEU deobligation process.
5. Pell grants will be reduced 30 days after the Pell LEU exceeded 600%.
6. Disbursements will be reduced so that the Pell LEU does not exceed 600%.
7. The reduced disbursement's sequence number will be 66 if that is the first system generated negative disbursement for that disbursement. If that disbursement has been reduced as a part of a negative disbursement due to other deobligation processes, the sequence number will be incremented by one.
8. As of April 2014, schools are able to initiate a Pell LEU dispute via the Pell LEU History Page on the COD Web. There must be a Pell

Grant on file for the student in order to initiate a dispute. The COD System will send a system generated negative disbursement response to a school's TG mailbox when a disbursement has been reduced as a part of the Pell LEU deobligation process.

9. The updated reduced Pell LEU will be included in the ND response.
10. The associated school's CFL will be reduced to NAPD the day after the Pell LEU deobligation reduction, if CFL equaled NAPD prior to the reduction.
11. A recipient's Pell LEU may exceed 600% and *may not* be subject to the LEU deobligation process in these rare circumstances:
  - a. If a recipient had both IASG Awards and Pell Awards and their combined Pell LEU exceeds 600% after their IASG LEU was converted to Pell LEU in spring 2024. The COD System will not initiate the deobligation process to bring their Pell LEU to 600%. The student would not be eligible for more Pell.
  - b. If a recipient's Pell LEU exceeded 600% at the inception of the LEU calculation process in 2010-11. The student would not be considered in overaward in this situation, but would not be eligible for more Pell.

## YEAR-ROUND PELL

Beginning with Award Year 2017-18, Pell eligible students may be able to receive up to 150% of the student's Scheduled Federal Pell Grant (SFPG) in a single award year. A student's eligibility for the additional 50% over the standard 100% SFPG will be relayed through the submission of the `<AdditionalEligibilityIndicator>` (AEI) field in the Pell Award block.

Beginning in Oct 2017, Pell eligible students may be eligible to receive up to 150% SFPG in a single award year, for the 2017-18 Award Year and forward as a result of amendments to Section 401(b)(8) of the Higher Education Act.

The COD System will accept, store, display, and return the optional `<AdditionalEligibilityIndicator>` (AEI) Boolean field.

## BUSINESS RULES

1. In order for a student to receive greater than 100% of the SFPG for Award Years 2017-18, an AEI = "true" must be submitted in the Pell Award Block.

Please reference Volume 2, Section 4 – Edits in the Technical Reference for more information.

2. If the AEI tag is submitted as "true" for Award Years 2011-12 through 2016-17, the AEI tag will be corrected to "false" with Edit 995 if the school's error processing option is set to 'correcting'. If the school's error processing option is set to 'rejecting', the Pell Grant will be rejected.

3. Edit 039 will continue to be triggered when a school submits a Pell Award with the AEI equal to “false” only if it exceeds the limit  $SFPG + |\text{Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) for that school and award year}|$ .
4. If the AEI is set to “true” on a Pell Grant where the Total Disbursed Amount is greater than zero, the COD System will allow a student's TEU to equal 150% plus the absolute net value of Closed School LEU Restoration Adjustments for that award year.
  - a. Edit 172 will trigger if the AEI is set to “true” and the Award Amount submitted is greater than 150% of the  $SFPG + |\text{Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) for that school and award year}|$
5. If the AEI is not submitted or is set to “false”, the COD System will allow the TEU to equal 100% plus the absolute net value of Closed School LEU Restoration and the Disaster Relief Adjustments for that award year.

The AEI is only to be set for students that will be disbursed more than 100% of their SFPG. Schools should delay setting the AEI to true until they are sure of this.

6. For the 2017-18 Award Year and forward, awards will be placed in a POP situation if the student has two or more Pell awards for an award year and their TEU exceeds their limit. The AEI will now be a determining factor if a student is either placed and/or removed from a POP situation. Please reference the Pell Potential Overaward Process (POP) Section of this Technical Reference for more information.

Closed schools in Pell Potential Overaward Process (POP) will not have their disbursements reduced to zero.

7. Pell awards will be placed in a Negative Pending situation if the Award Amount is reduced to a value less than the funded Disbursement Amount, regardless of the AEI value for an award.
  - a. If the AEI is changed from “true” to “false”, and the Award Amount is greater than the  $SFPG + |\text{Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) for that school and award year}|$ , the COD System will trigger the Award Level Rejecting/Correcting Edit 173.
  - b. If the AEI is changed from “true” to “false”, and the Award Amount is reduced to a value less than the funded Disbursement Amount, Award Level Warning Edit 174 will trigger
8. Negative Disbursement Responses will contain the `<AdditionalEligibilityIndicator>` tag if the field was submitted by the school and accepted by COD for the associated Pell award. The tag may contain a value of “true” or “false” and will be returned in the Pell Award Block of the Negative Disbursement Response. If the tag was not submitted by the school or not accepted by COD, the tag will not be returned.

## PELL ADMINISTRATIVE COST ALLOWANCE (ACA)

The COD System calculates and pays ACA amounts.

### BUSINESS RULES

1. The COD System calculates ACA amounts based on the number of unduplicated recipients at each Reporting campus.
2. The COD System pays ACA for students with at least one accepted and posted disbursement during the course of an award year.
3. The COD System disburses ACA multiple times during the award year.
4. The Administrative Cost Allowance processing option allows schools to indicate whether or not it will receive the Pell Administrative Costs Allowance (ACA) for each award year.
  - a. The Administrative Cost Allowance processing option can be viewed on the [COD Website](#).
  - b. Schools may contact COD School Relations to request that FSA change this option.
5. The COD System will process decreases in ACA obligations.
6. The COD System will generate and send an Electronic Statement of Account (ESOA) to the School's SAIG mailbox when they receive an ACA.

## PELL POTENTIAL OVERAWARD PROCESS (POP)

A student may receive disbursements from more than one Attended School during the course of an award year. When more than one Attended School reports disbursements for a student, the COD System checks to make sure that the student has not received:

- a. A TEU greater than 100% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments for that award year and the AEI is not set to "true" for any awards with funded disbursements greater than \$0 in that award year.
- OR
- b. A TEU of greater than 150% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments for that award year and the AEI is set to "true" for at least one award with funded disbursements greater than \$0 in that award year.

Section 34CFR 690.65 of the regulations provides the basis for determining a student's remaining eligibility when another school has disbursed Pell Grant funds to the student:

- Calculate the percentage of Eligibility Used at each previous school by dividing the disbursements to the student at the school by the Scheduled Grant at that specific school.
- Calculate the percentage of Total Eligibility Used for the award year by adding the Eligibility Used for all schools the student previously attended.
- Calculating the net percentage of Closed School Restoration and Restoration for Discharge Adjustments for the award year.
- Calculate the Remaining Eligibility when the AEI is:
  - Not set to "true" in that award year, subtract the Total Eligibility Used from the sum of (100% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments for that award year)
  - OR
  - Set to "true" in that award year, subtract the Total Eligibility Used from the sum of (150% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments for that award year).
- The Remaining Eligibility is the percentage of the Scheduled Grant at the new school to which the student is entitled.

If the COD System receives disbursement information that places the student in a situation where he/she has received more than 100% (or 150% if AEI is set to "true") of their SFPG, the student has entered a Potential Overaward Process (POP) situation. In a POP situation, the COD System accepts the disbursement information and notifies all schools involved that the POP situation must be resolved within 30 calendar days. If after 30 calendar days the situation has not been resolved, the COD System generates a Negative Disbursement for all of the student's Pell disbursements at all schools for that award year. The eligible schools are then required to re-report accurate disbursement records to reinstate the student's disbursements.

## BUSINESS RULES

1. A student may not receive more than 100% of their SFPG for a Pell Grant plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments when the student does not have AEI set to "true" for any awards with net funded disbursements greater than \$0 and in that award year.
2. A student may not receive more than 150% of their SFPG for a Pell Grant plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments when the student has AEI set to "true" for at least one award with net funded disbursements greater than \$0 and in that award year.

3. A school to which a student transfers must determine the student's Total Eligibility Used, considering disbursements made and the Scheduled Grant at each school the student previously attended in the award year.
4. When the COD System receives disbursement information for a student from more than one Attended School for the same award year, the COD System checks whether the student has received more than 100% (or 150% if AEI is set to "true") of their total SFPG for a Pell Grant plus the absolute net value of Closed School Restoration and Restoration for Discharge Adjustments.
5. If a POP situation exists, the COD System sends the school that submitted the Disbursement Information a Response document containing:
  - a. Warning Edit 068 (Potential Overaward Process - Notice Sent Separately)
  - b. FSA Code value of PO (PO = Pell POP)
  - c. Total Eligibility Used (TEU) value greater than:
    - i. 100% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments when the student does not have AEI set to "true" any awards with net funded disbursements greater than \$0 and in that award year.
    - ii. 150% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments when the student has AEI set to "true" for at least one award with net funded disbursements greater than \$0 and in that award year.
6. The COD System sends the school that submitted the Disbursement Information and all other schools with accepted and posted Disbursement Information in COD for that student and that award year a Multiple Reporting Record (MRR).

**Multiple Reporting Record**

For more information about the MRR please refer to Volume 6, Section 7 – COD Reports.

7. The COD System sends a weekly Pell POP Report to schools that have an accepted actual disbursement for students that are in or have been in a POP situation for this award year.

**Pell POP Report**

For more information please refer to Volume 6, Section 7 – COD Reports.

8. The COD System allows a POP situation to exist for 30 calendar days from the date the student entered the POP situation (defined as the date the MRR for the POP situation is created).
9. During the 30 day period, each school involved in the Potential Overaward must review the student's award and disbursements and apply the proper eligibility calculation.

10. During that 30-day period, the COD System can accept and post further disbursements that decrease or increase the student's year-to-date disbursement amount.
11. The COD System accepts Disbursement Information from no more than 3 schools for a student in a POP situation.
12. If the student remains in a POP situation after 30 calendar days, the COD System reduces all accepted and posted disbursements to zero (\$0.00) for that student and that award year at all schools involved.
13. Each school that correctly paid the student Pell Grant funds must re-report the student's Disbursement Information to COD.
14. During the POP situation, the COD School Relations Center will take a proactive role in contacting the schools.
15. COD does not prevent the same schools from creating another POP situation for the same student.
16. COD School Relations will escalate the issue should the same schools create another POP situation involving the same student.
17. Students will be removed from POP status within 30 days from the date the student was initially placed in the POP based on either of the following conditions:
  - a. The student's TEU becomes 100% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments for that award year or below based on downward disbursement adjustments submitted by the schools and the student does not have an AEI of "true" for any award with net funded disbursements greater than \$0, at a school within that award year.
  - b. A school submits a maintenance record with an AEI of "true" for any award with net funded disbursements greater than \$0, at a school within that award year, and the student's TEU becomes 150% plus the absolute net value of Closed School Restoration Adjustments, Disaster Relief Adjustments, and Restoration for Discharge Adjustments for that award year or below.

## **BUSINESS RULES FOR EXTENDED PROCESSING AND POP**

1. Extended Processing is available on a case-by-case basis for five years after the award year's data submission deadline. Therefore, a school with extended processing can trigger a POP situation for a student in an award year that another school has already finished processing.
2. Schools are encouraged to pay close attention to Pell POP Reports and Multiple Reporting Records (MRRs) received after the processing deadline for a prior award year.
3. In order to ensure proper distribution of funds, the COD System will reduce all disbursements for that student and that award year for ALL schools involved in the POP situation, regardless of if a school has extended processing for that award year.
4. Schools should work with Customer Service to resolve the POP situation during the 30-day period to prevent the COD System from negatively reducing disbursements after the processing deadline.
5. Schools do not need to request extended processing to submit upward adjustment records after the end of the processing year in order to correct a



POP situation.

6. The COD System accepts downward adjustments to disbursement or award information at any time.
7. Disbursement information can be submitted via the [COD Website](#) for those schools that do not wish, or are not able, to re-open any software they may have used to process the affected award year.

## EXTENDED PROCESSING

The Federal Pell Grant Program regulations at 34 CFR 690.83(a) establishes the deadline by which a school must submit all student payment data each award year. FSA provides an extension to this established data submission deadline on a case-by-case basis. The following business rules apply to this extension.

### BUSINESS RULES

1. After the data submission deadline of the processing year, the COD System accepts and processes decreases to previously accepted award originations and decreases to previously accepted disbursements.
2. After the data processing deadline of the processing year, the COD System accepts and processes previously accepted disbursements newly flagged with the Coronavirus Indicator including any non-financial changes.
3. After the data processing deadline of the processing year, the COD System accepts and processes originations and disbursements of new awards or award amount increases only if the student was in a POP situation during the award year OR the Department has granted Extended Processing for the award year.
  - a. Unless one of the above conditions are true, the COD System rejects new awards or award amount increases with error code 043 – New Award Amount or Award Increase Received After End of Processing Year and Institution Has Not Been Granted Extended Processing.
  - b. Unless one of the above conditions are true, the COD System rejects new disbursements or disbursement amount increases with error code 071 – New Disbursement Increase to “Y” Received After End of Processing Year and Institution Has Not Been Granted Extended Processing.
4. September 30, 2031, is also the final deadline for funds availability for the 2025-26 Pell Grant Award Year. After that time, schools will be unable to draw down or adjust further funds via G5 (although refunds of cash will still be accepted via a miscellaneous account), and the COD System will be closed to any further award or disbursement processing for that award year. As such, schools must complete all final reconciliation activities well before this final deadline and in accordance with cash management and disbursement reporting deadlines as published in the Federal Register annual Deadline Date Notice.

## PELL LIFETIME ELIGIBILITY USED

Pell Lifetime Eligibility Used (LEU) is the sum of all Eligibility Used (EU) for all award years. In July 2012, the functionality which only calculated Pell LEU for students who received their first actual disbursement in Award Year 2008-09 and forward was retired. The new Pell LEU limit of 600% now applies to all Pell recipients for all award years. These calculations are made real time and displayed on the COD web.

In June 2013, the COD System began returning a new correcting/reject edit (Edit 201) if a disbursement causes a recipient to exceed the LEU limit of 600%. The edit will apply to Award Years 2012-13 and forward.

**NOTE:** Because of the sunset of the stand-alone Iraq and Afghanistan Service Grant (IASG) program with the 2023-24 award year, all existing IASG LEUs were converted to Pell LEU through a Pell LEU adjustment type: "IASG LEU Adjustment". Each IASG LEU Adjustment corresponds to each award year's IASG Eligibility Used (EU) percentage to create this combined LEU that represents both Pell and IASG lifetime eligibility used. IASG recipients that never received Pell prior to the conversion had a Pell LEU created from the IASG LEU Adjustments.

### Lifetime Eligibility Used Calculation:

LEU % = Sum of ALL EU's for all award years (archived and non-archived) + LEU Adjustments.

## BUSINESS RULES

1. Beginning in July 2012, LEU is calculated for all Pell recipients.
2. COD returns the <LifetimeEligibilityUsed> tag in the Common Record Response for Pell Awards for the 2010-11 Award Year and forward.
3. The Pell LEU incorporates all LEU Adjustments made to the student's Pell eligibility.
4. Two existing warning level edits will inform schools when students are nearing or have exceeded their LEU.
5. As of the 2010-11 Award Year and forward, COD includes LEU in the system generated Negative Disbursement Responses for Pell.
6. 2012-13 (and forward) Pell disbursements which cause the LEU to exceed 600% will be corrected/rejected.
  - a. For rejecting schools, the system will reject the disbursement(s) with Edit 201.
  - b. For correcting schools, the system will correct the disbursement(s) so that the LEU does not exceed 600%.
7. If multiple disbursements must be corrected, disbursements will be corrected beginning with the highest disbursement number.
8. As of April 2024, the Pell LEU includes any eligibility used in the Iraq Afghanistan Service Grant program (2010-11 through 2023-24). This conversion of the IASG LEU into the Pell LEU is achieved by adding "IASG LEU Adjustments" corresponding to each IASG EU and continuously monitoring and updating the adjustment percentages based on any disbursement changes that alter the IASG LEU.

9. A recipient's Pell LEU may exceed 600% under the following circumstances:
  - a. If a recipient's Student Aid Index (SAI), Max Pell Indicator, Minimum Pell Indicator, Iraq Afghanistan Service Grants Indicator, Children of Fallen Heroes Indicator or Pell Eligibility Flag is changed as a result of updating the FPS transaction number, or the Cost of Attendance (COA) is changed. Please refer to the Deobligation Due to Pell LEU Exceeding 600% section within the Implementation Guide of the Technical Reference.
  - b. If a recipient's Pell LEU exceeds 600% due to a change to the scheduled award amount, the Pell grant may be included as a part of the LEU deobligation process. Please refer to the Deobligation Due to Pell LEU Exceeding 600% section within the Implementation Guide of the Technical Reference.
  - c. If a recipient had both IASG Awards and Pell Awards their combined Pell LEU may exceed 600% after the conversion of the IASG LEU into Pell LEU. The student would not be included in the deobligation process in this situation but would not be eligible for any more Pell in the 2024-25 and forward.

## PELL GRANT CLOSEOUT

The Pell data submission (closeout) deadline is the last processing date of September following the end of the award year (i.e. for 2025-26 the closeout deadline would be September 30, 2026). This is the last processing day of the program year, so all school data must be received and accepted by this date in order to be included in a school's final Cash > Net Accepted and Posted Disbursement (NAPD) balance for the year.

### BUSINESS RULES

1. When the school's internal Cash > NAPD balance is \$0 and is in agreement with the Department's official Cash > NAPD balance reflected in the school's most recent Pell Grant School Account Statement (SAS) for the award year, and the school has no outstanding issues for this program year, the school should complete the School Closeout Balance Confirmation form in COD Website. Once the school has successfully confirmed closeout the following actions will occur:
  - a. The Department will send a Program Year Closeout letter to the school's President and Financial Aid Director.
  - b. COD will reject award and disbursement increases and new disbursements per published edits.
  - c. The Department will reduce the school's Current Funding Level (CFL) to Net Accepted and Posted Disbursements.
  - d. The SAS for this award year and program will no longer be sent.

**NOTE:** After successfully confirming close out, if the school needs to submit award or disbursement increases or new disbursements in the future, they must request to be reopened or placed on extended processing via the Request Reopen/Extended Processing page on the COD Website.

2. COD will send the following closeout correspondence:

- a. **Balance Notification Letter:** Sent to schools as a reminder to finish processing and confirm closeout before the established data submission deadline.
- b. **Program Year Closeout Letter:** Sent to schools once they have completed the balance confirmation process and are considered closed out for the requested program and award year. This includes completing the Balance Confirmation Page in COD Web and verifying their Cash > NAPD balance hasn't changed.
- c. **Reopen Change Letter:** Sent to schools to notify them that they are no longer considered confirmed closed out for the award year because:
  - i. The school's balances in the Common Origination and Disbursement (COD) System have changed and/or
  - ii. Staff at school has requested to be reopened to continue processing via the Request Reopen/Extended Processing page on the [COD Website](#)
- d. **Extended Processing Letter:** Sent to schools that have been approved for an extension to the data submission deadline. Notifies the school of the expiration date of that extension.

**NOTE:** Schools can find a HTML copy of the above correspondence on the School Correspondence page via the COD Website.

## IRAQ AND AFGHANISTAN SERVICE GRANT AWARD AND DISBURSEMENT PROCESS

The Iraq Afghanistan Service Grant was a separately funded grant program from Award Years 2010-11 through 2023-24. It allowed Pell-ineligible students, identified by the Department of Defense as a dependent of a parent or guardian who died as a result of service in Iraq or Afghanistan after September 11, 2001, to be awarded Iraq and Afghanistan Service Grant (IASG) funds. The data match with the Department of Defense (DoD) and subsequent ISIR "DoD Match Flag" ended with the 2023-24 Award Year as well as the corresponding COD "Post 9/11 Deceased Veteran Dependent Indicator." Please reference the 2023-24 COD Technical Reference Implementation Guide for processing information on the IASG program.

For award years 2010-11 through 2023-24 the "IAS Grant" field was manually set by the school on the Pell create/update award screens allowed Pell-ineligible students Iraq and Afghanistan Service Grant funds if they had a DoD Match flag= Yes.

For the 2024-25 Award Year and forward the "IAS Grant" field is automatically populated based on the value for the new Iraq Afghanistan Service Grant Indicator on the FPS transaction. The Iraq Afghanistan Service Grant Indicator reflects the financial aid administrator's (FAA) certification that a student's parent or guardian has died in the line of duty as an active duty military servicemember. A positive validation of eligibility by the FAA will allow for maximum Pell Grant eligibility. For more information on the "IAS Grant" field and the Iraq Afghanistan Service Grant Indicator, please see the Pell Grant Award and Disbursement Process section in this Implementation Guide.

## IRAQ AND AFGHANISTAN SERVICE GRANT LIFETIME ELIGIBILITY USED

Iraq and Afghanistan Service Grant Lifetime Eligibility Used (LEU) is the sum of all Iraq and Afghanistan Service Grant Eligibility Used (EU) for all years from the 2010-2011 to 2023-24 Award Year. The Iraq and Afghanistan Service Grant LEU limit of 600% applied to all Iraq and Afghanistan Service Grant recipients for all valid award years.

**Note:** Please consult the 2023-24 COD Implementation Guides for detailed information regarding the IASG LEU functionality in prior years.

**Note:** Please see the “Pell Lifetime Eligibility Used” topic in this Implementation guide for detailed information regarding the conversion of IASG LEU to Pell LEU.

## Academic Competitiveness Grant (ACG)

ACG is not applicable for the 2011-12 Award Year and forward. Please reference prior award year Technical Reference Documentation for information on ACG. Beginning in March 2016, the COD system will no longer support processing of ACG records.

## National Science and Mathematics Access to Retain Talent (SMART)

SMART is not applicable for the 2011-12 Award Year and forward. Please reference prior award year Technical Reference Documentation for information on SMART awards. Beginning in March 2016, the COD system will no longer support processing of SMART records.

## Teacher Education Assistance for College and Higher Education (TEACH) Award and Disbursement Process

### OVERVIEW

Through the College Cost Reduction and Access Act of 2007, Congress created the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program that provides grants of up to \$4,000 per year to students who intend to teach in a public or private elementary or secondary school that serves students from low-income families. Eligible undergraduate and post-baccalaureate students may receive up to an aggregate limit of \$16,000 and graduate students may receive up to a graduate aggregate limit of \$8,000 in TEACH Grants.

In exchange for receiving a TEACH Grant, students must agree to serve as a full-time teacher in a high-need field in a public or private elementary or secondary school that serves low-income students. Recipients must teach for at least four academic years within eight calendar years of completing the program of study for which they received a TEACH Grant. If they don't complete this service obligation, all amounts of TEACH Grants received will be converted to a Federal Direct Unsubsidized Stafford Loan and interest charged from the date the grant(s) was disbursed.

## SCHOOL ELIGIBILITY

COD will process TEACH Grant awards and disbursements submitted by TEACH Program Eligible Schools. The COD System verifies the attending school is eligible for the TEACH Program before processing a TEACH Grant record.

### BUSINESS RULES

1. If a school loses eligibility for the Title IV Program, it also loses eligibility for the TEACH Grant program. However, if a school loses eligibility for the TEACH Grant program it does not affect eligibility for other Title IV Programs.
2. Reporting/Attending relationships are at the program level and schools reporting TEACH Grants for other schools must be identified within COD as their reporting school. If the reporting school identified in the common record doesn't have a reporting relationship with the attended school, COD will reject the records with (Edit 002, 100).
3. Attending schools can only submit TEACH Grant awards through reporting schools to which they have a valid relationship. COD rejects the TEACH Grant award if the attending school Routing ID has no established relationship to the Routing ID in the reporting school complex element (Edit 034).
4. If an attending school is eligible for the TEACH Grant program and the reporting school is ineligible for the TEACH Grant program, COD accepts and processes the record and returns warning edit (Edit 101).
5. Attending schools must be a main location. COD rejects the TEACH Grant award if the attending school in the award block is not a main location (Edit 166). Schools will not be allowed to report records with an additional location identified as the attending school.
  - a. A main location is defined as a school with an OPEID with zeroes located in the first, seventh, and eighth positions.

## STUDENT ELIGIBILITY

A student's eligibility for the TEACH Grant program will be determined by the school. To be eligible for a TEACH Grant award, the student must:

1. Meet the basic eligibility criteria for the federal student aid programs.
2. Complete the Free Application for Federal Student Aid (FAFSA®), although you do not have to demonstrate financial need.
3. Be a U.S. Citizen or eligible non-citizen.
4. Be enrolled as an undergraduate, post-baccalaureate, or graduate student in a postsecondary educational institution that has chosen to participate in the TEACH Grant Program.
5. Be enrolled in coursework that is necessary to begin a career in teaching or plan to complete such coursework. Such coursework may include

subject area courses (e.g., math courses for a student who intends to be a math teacher).

6. Meet certain academic achievement requirements (generally, scoring above the 75th percentile on a college admissions test or maintaining a cumulative GPA of at least 3.25) OR be a current teacher or retired expert in a Teacher Shortage Area.
7. Sign a TEACH Grant Agreement to Serve or Repay.
8. Complete the yearly counseling requirement.

## REPORTING PENNIES IN THE AWARD AND DISBURSEMENT AMOUNT DATA ELEMENTS

The Award and Disbursement Amounts on the Common Record may include pennies. In the TEACH Grant Program, pennies can be reported as partial dollars or two zeroes.

### BUSINESS RULES

1. The data elements for Award and Disbursement Amounts on the Common Record may include two digits to the right of a decimal point.
2. When the reported amount does not include a decimal point, the COD System infers a decimal point and two zeroes to the right of the last digit reported. For example, if a school reports 1000, the COD System infers a decimal and two zeroes and stores as 1000.00.
3. In the TEACH Grant Program, schools may report partial dollars (500.32) OR zeroes in the last two digits (500.00) for Award Amount and Disbursement Amount

OR

4. Report the whole dollar amount only (500) and the COD System infers the decimal point and two zeroes and stores as (500.00).
5. The Award and Disbursement Amount data elements are:
  - a. Award Amount, <FinancialAwardAmount>
  - b. Disbursement Amount, <DisbursementAmount>
6. When performing edits on the Award Amount, COD calculates the TEACH Grant Award Amount using the data provided by the school. If the COD calculated Award Amount contains partial dollar amounts, COD rounds up this Award Amount to the next whole dollar amount. This is the COD calculated Award Amount. COD compares the COD calculated Award Amount to the Award Amount <FinancialAwardAmount> reported by the school.

- a. If the school reported Award Amount is less than or equal to the COD calculated Award Amount, COD accepts the Award Amount.
- b. If the school reported Award Amount is greater than the COD calculated Award Amount, COD rejects the school reported Award Amount

#### Example

When reporting an amount of \$2625.34:

1. Include the decimal point and two digits to the right: 2625.34

OR

2. Include the decimal point and two zeroes to the right: 2625.00

OR

3. Omit the decimal point and report the whole dollar amount only: 2625

Then, the COD System infers a decimal point and two zeroes and stores 2625.00.

Do **not** submit 262500 as the COD System infers a decimal and stores this submission as 262500.00.

## CREATING FINANCIAL AWARD ID AND FINANCIAL AWARD NUMBER

The Financial Award ID and Financial Award Number are used to uniquely identify a TEACH Grant Award.

### FINANCIAL AWARD ID

1. The Financial Award ID is a unique identifier that helps distinguish all awards
2. Elements of the Financial Award ID (21 characters)
  - a. Current SSN
  - b. Award Type (H=TEACH Grant)
  - c. Award Year (25)



- d. First six digits of the OPEID (Attended School)
- e. Award Sequence Number

The Pell program is award year specific and only allows one award for a student at a school per award year. In the TEACH Grant program, a student may have more than one award in a single award year. A school could submit two TEACH Grant awards with the same student level for a student in the same common record document provided the Award IDs are unique.

Unlike Pell, schools must submit a Financial Award ID and Financial Award Number to establish a TEACH Grant award. (See Common Record Layout for details.).

## ESTABLISHING TEACH GRANT AWARD INFORMATION

Award information submitted to the COD System for a student from a specific Attended School applies to the entire award year for that student. Disbursement information is required when creating all initial TEACH Grants on the web or by Common Record submission to the COD System.

For award years 2025-26 and forward, the new CIP complex element and its associated tags will have a maximum of 3 occurrences. When a student is enrolled in multiple programs under the same payment period, up to three CIP tags can be submitted per disbursement.

## BUSINESS RULES

1. The first submission of Award information that is accepted by the COD System establishes the TEACH Grant award for the student for that Attended School Routing ID and award year.
2. A TEACH Grant Award cannot be originated with an award amount equal to zero (Edit 042).
3. A school may originate more than one TEACH award for the same student within an award year, across schools or at a single school.
4. The Award amount for a single Award cannot exceed \$4,000 (Edit 162).
5. The cumulative award amount for all TEACH Grant awards across all schools, across all grade levels, cannot exceed the maximum of \$8000 for a single award year (Edit 163).
6. Student level code can span multiple award years.
7. The sum of the disbursement amounts must equal the award amount in order to originate the TEACH Grant award.
8. The following fields must be populated with a valid value in order to create an TEACH Grant award:
  - a. Student SSN

- b. Date of Birth
  - c. Last Name
  - d. Financial Award Type
  - e. Financial Award Year
  - f. Financial Award Number
  - g. Financial Award Amount
  - h. FPS Transaction Number
  - i. Enrollment Date
  - j. Financial Award ID
  - k. Student Level Code
9. A complete address is required to establish a TEACH Grant award. However, these tags are not required to be submitted on the incoming record if it can be pulled from the FPS or the COD database.
- a. Complete address
  - b. The data elements for a complete address are:
    - i. Address Line <AddressLine>
    - ii. City, <City>
    - iii. For domestic addresses <StateProvinceCode>
    - iv. Postal Code, <PostalCode>
    - v. Code, <CountryCode> (international addresses only)
  - c. If any of the address fields are blank, COD will attempt to pull all address data elements from FPS or the COD database.
  - d. The COD System will pull the student address for the highest FPS transaction number for the most recent award year.
  - e. If a complete address cannot be found on FPS, COD database, or input file, the Person and Award record will reject (Edit 021).

- i. The school must resubmit the record with a complete address.
  - f. If a complete address is found on FPS or the COD database, the record will accept and the school will receive a warning message that a complete address exists on COD (Edit 120).
10. An eligible Citizenship Status is required to originate a TEACH award on COD.
- a. For TEACH awards, the valid values for Citizenship Status Code are 1 (US Citizen) and 2 (Eligible Non-Citizen). If an invalid value is submitted, COD will reject the origination.
  - b. If a Citizenship Status Code is provided in the common record, COD will accept and store a valid value.
  - c. If a Citizenship Status Code is not provided in the common record, COD will attempt to pull the value from FPS.
    - i. If a valid value cannot be pulled from FPS, COD will reject the origination.
11. Schools must report the same Award Type in the Award ID as the Award Type submitted in the Award Block (Edit 035).
12. Schools must report the same award year in the Award ID as listed in the Award Information Block (Edit 035).
13. The COD System does not allow duplicate TEACH Grant Award IDs on the system (Edit 033).
14. The COD System does not allow schools to originate a TEACH Grant award or increase a TEACH Grant award amount if the Received Date is after the Latest Date to Accept a Common Record, unless the school has been granted extended processing.
15. Setting the optional Teacher Expert Indicator, `<TeacherExpertIndicator>`, to true indicates that a graduate student is either a current teacher or a retired expert in a Teacher Shortage Area.
- a. If the `<TeacherExpertIndicator>` is set to true with the Student Level Code not equal to 6 or 7, the COD system will reject the record (Edit 164).
  - b. The value of the Teacher Expert Indicator does not affect the maximum Grant Amount.
16. The COD System will not allow schools to report a different Award Type in the Award ID than the Award Type in the Award Block. If a school submits a TEACH Grant record that reports the Award Type in the Award ID as not equal to H, COD will reject the record and return an edit to the school (Edit 035). Conversely, COD will reject the record if the Award Type in the Award ID is H and the program is not TEACH Grant.
17. The COD System will not allow schools to report a different award year in the Award ID than the award year listed in the Award Information Block. If a school submits a TEACH Grant record that reports the award year of the Award ID as different from the award year indicated in the Award Information Block, COD will reject the record and return an edit to the school (Edit 035).
18. The COD system will verify the first six digits of the OPEID submitted in the Award ID match the first six digits of the OPEID of the Attended

School. If the six-digit OPEID populated in the Award ID does not match the first six digits of the OPEID of the attended school referenced by Routing ID in the common record, COD will reject the record and return an edit to the school.

19. The COD System will not allow duplicate TEACH Grant Award IDs on the system. If a school submits a TEACH Grant origination and the TEACH Grant Award ID is already established under a different student than the one on the incoming TEACH record, COD will reject the award origination and return a reject edit to the school (Edit 033). If a school submits a TEACH award and the TEACH Award ID is already established under the same student, but with a different award number than the one on the incoming TEACH record, COD will reject the award origination and return a reject edit to the school.
20. The COD System will reject a TEACH Grant award record if the Award Identifiers (Attended Routing ID, award year, and Award Number) already exist for this student and the school is trying to change the Award ID (Edit 033).
21. If an award rejects when establishing an initial TEACH Grant, the award will not be linked to a TEACH Agreement to Serve or Repay
22. The COD System requires submission of all disbursement information when establishing a TEACH award via the common record or COD Website. This data is used when producing the TEACH disclosure statement.
23. The following disbursement level data elements are required for establishing a TEACH Award:
  - a. For TEACH actual disbursements (DRI is true), the COD System requires the following disbursement level fields:
    - Disbursement Number, <Disbursement Number=" ">
    - Disbursement Amount, <DisbursementAmount>
    - Disbursement Sequence Number, <DisbursementSequenceNumber>
    - Disbursement Date, <DisbursementDate>
    - Disbursement Release Indicator is true, <DisbursementReleaseIndicator>true</DisbursementReleaseIndicator>
    - CIP Number, <CIP Number="">
    - Published Program Length Years, <PublishedPgmLengthYears>
    - Published Program Length Months, <PublishedPgmLengthMonths>
    - Published Program Length Weeks, <PublishedPgmLengthWeeks>
    - Weeks Programs Academic Year, <WeeksProgramsAcademicYear>

- Special Programs, <SpecialPrograms>
- Program Credential Level, <ProgramCredentialLevel>
- Enrollment Status, <EnrollmentStatus>
- Program CIP Code, <ProgramCIPCode>
- Program CIP Code Year, <ProgramCIPCodeYear>
- Payment Period Start Date, <PaymentPeriodStartDate>

Note: Payment Period Start Date is required for award years 2022-23 and forward. For award years 2021-22 and prior, only required if there was a period of ineligibility at the school

- Payment Period End Date, <PaymentPeriodEndDate>

The Payment Period End Date must be contained within the valid disbursement date range. If the Payment Period End Date is not contained within the valid disbursement date range, the COD System will reject the disbursement with edit 228.

Payment Period End Date must be greater than the Payment Start Date. If the Payment Period End Date submitted is less than or equal to the Payment Period Start Date, the COD System will reject the disbursement with Edit 227.

Note: Payment Period End date is required for award years 2022-23 and forward.

b. For TEACH anticipated disbursements (DRI is false), the COD System requires the following disbursement level fields:

- Disbursement Number, <Disbursement Number=" ">
- Disbursement Amount, <DisbursementAmount>
- Disbursement Sequence Number, <DisbursementSequenceNumber>
- Disbursement Date, <DisbursementDate>
- Disbursement Release Indicator is false, <DisbursementReleaseIndicator>>false</DisbursementReleaseIndicator>
- Enrollment Status, <EnrollmentStatus>
- Program CIP Code, <ProgramCIPCode>

- Program CIP Code Year <ProgramCIPCodeYear>
- Published Program Length Years, <PublishedPgmLengthYears>
- Published Program Length Months, <PublishedPgmLengthMonths>
- Published Program Length Weeks, <PublishedPgmLengthWeeks>
- Weeks Programs Academic Year, <WeeksProgramsAcademicYear>
- Special Programs, <SpecialPrograms>
- Program Credential Level, <ProgramCredentialLevel>
- Payment Period Start Date, <PaymentPeriodStartDate>

Note: Payment Period Start Date is required for award years 2022-23 and forward. For award years 2022-23 and prior, only required if there was a period of ineligibility at the school.

- Payment Period End Date, <PaymentPeriodEndDate>

The Payment Period End Date must be contained within the valid disbursement date range. If the Payment Period End Date is not contained within the valid disbursement date range, the COD System will reject the disbursement with edit 228.

Payment Period End Date must be greater than the Payment Start Date. If the Payment Period End Date submitted is less than or equal to the Payment Period Start Date, the COD System will reject the disbursement with Edit 227.

Note: Payment Period End date is required for award years 2022-23 and forward.

### Sum of Disbursements

The Program Credential Level <ProgramCredentialLevel> is only valid for the 2017-2018 Award Year and forward. The valid values for Program Credential Level are:

1: Undergraduate certificate or diploma program

2: Associate's degree

- 3: Bachelor's degree
- 4: Post Baccalaureate certificate
- 5: Master's degree
- 6: Doctoral degree
- 7: First Professional degree
- 8: Graduate/Professional certificate
- 9: Non-credential programs (preparatory coursework/teacher certification)

24. COD system shall validate the Student Level against the Program Credential Level value on all incoming TEACH Records. If an invalid combination is submitted, the system will reject with Edit 208. Valid combinations are included below:

Description	Program Credential Level	Student Level Code
Undergraduate certificate or diploma program	1	0-5 (Undergraduate)
Associate's degree	2	0-5 (Undergraduate)
Bachelor's degree	3	0-5 (Undergraduate)
Post Baccalaureate certificate	4	0-5 (Undergraduate)
Master's degree	5	0-7 (Undergraduate & Graduate)
Doctoral degree	6	0-7 (Undergraduate & Graduate)
First Professional degree	7	0-7 (Undergraduate & Graduate)
Graduate/Professional certificate	8	0-7 (Undergraduate & Graduate)
Non-credential programs (preparatory coursework/teacher certification)	99	0-5 (Undergraduate)

Table 50

25. The `<PublishedProgramLengthYears>`, `<PublishedProgramLengthMonths>`, and `<PublishedProgramLengthWeeks>` tags are only valid for the 2017-2018 Award Year and forward. The COD System shall validate that only one of the three tags `<PublishedProgramLengthYears>`, `<PublishedProgramLengthMonths>`, or `<PublishedProgramLengthWeeks>` is submitted on an incoming record. If more than one is submitted, the system will reject with edit 202.
26. The Week Program Academic Year `<WeeksProgramAcademicYear>` tag is only valid for the 2017-2018 Award Year and forward. The COD System shall validate the `<WeeksProgramsAcademicYear>` tag when submitted
- a. The Weeks Programs Academic Year is the Title IV Academic Year and must be greater than or equal to 26. The COD System will reject the record with edit 209 if the Weeks Programs Academic Year is less than 26.
  - b. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag must be submitted when `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` is submitted, or the `<SpecialPrograms>` is set to "Preparatory\ Coursework Graduate Professional Program."
  - c. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag will be ignored if submitted with the `<PublishedPgmLengthYears>` and will not be stored.
  - d. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag is optional when submitting changes to a disbursement.
  - e. The Weeks Programs Academic Year `<WeeksProgramsAcademicYear>` tag must be submitted when changing the Special Program to 'Preparatory Coursework Graduate Professional Program' or submitting `<PublishedPgmLengthMonths>` or `<PublishedPgmLengthWeeks>` when `<PublishedPgmLengthYears>` was previously submitted for the disbursement.
27. The Special Programs `<SpecialPrograms>` is only valid for the 2017-18 Award Year and forward. If the tag is submitted it must include one of the following valid values for Special Programs:
- a. 'A' – Selective Admission Associated Program
  - b. 'B' – Bachelor's Degree Completion Program
  - c. 'N' – Not Applicable
  - d. 'P' – Preparatory Coursework Graduate Professional Program
  - e. 'T' – Non-Credential Teacher Certification Program
  - f. 'U' – Preparatory Coursework Undergraduate Program
28. The COD System shall validate the `<SpecialPrograms>` tag in conjunction with the Grade Level field on all TEACH records. If the Grade Level / Special Programs combination is not valid, the system will reject with edit 203. Valid combinations are included below.



**Note:** For all 2017-18 awards and forward, the Special Programs tag is a disbursement level field. This may result in disbursements for a single TEACH award to have different Special Programs values. The COD System will determine whether Undergraduate Subsidized usage or Non-Credential Teacher Certification usage is calculated based off other relevant disbursement data; the usage for that award will continue to only apply to one subsidized usage category.

Special Program	Value	Valid Grade Levels
Selective Admission Associated Program	A	0-5
Bachelor's Degree Completion Program	B	0-5
Not Applicable	N	N/A
Preparatory Coursework Graduate Professional Program	P	5
Non-Credential Teacher Certification	T	5
Preparatory Coursework Undergraduate Program	U	1, 0
Tag Not Submitted	N/A	N/A

Table 51

29. The COD system will require the Enrollment Status and CIP code(s) on TEACH Disbursements.

30. Enrollment Status <EnrollmentStatus> must equal the enrollment status of the student at the time of disbursement or if the disbursement is outside the loan period, the enrollment status of the student at the beginning of the payment period for which the disbursement is intended.

a. The valid values for <EnrollmentStatus> are:

- i. 'F' - Full Time = 1.00
- ii. 'Q' - Three-quarters Time = 0.75
- iii. 'H' - Half Time = 0.50
- iv. 'L' - Less than half time

b. Enrollment Status <EnrollmentStatus> is optional when submitting changes to disbursements and should only be resubmitted if the

original submission was incorrect.

31. The Program CIP Code<ProgramCIPCode> is required on TEACH Disbursements.

- a. The valid CIP codes can be found at the following location: <http://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55>
- b. The COD System will allow a maximum of three occurrences for the CIP Code field for Award Year 2024-25 and forward.
- c. The COD System will store each CIP Code value once when duplicate values are received with warning edit 131.
- d. The COD System will reject an invalid CIP Code with edit 204.
- e. A valid <ProgramCIPCode> must be submitted with a disbursement upon origination.
- f. <ProgramCIPCode> must be submitted within the CIP tag complex element for Award Year 2025-26 and forward

32. The Program CIP Code Year <ProgramCIPCodeYear> is required on TEACH Disbursements.

- a. The COD System will reject an invalid CIP Code Year with edit 204.
- b. A valid <ProgramCIPCodeYear> must be submitted with a disbursement upon origination.

33. The COD System compares the sum of the disbursements (anticipated and/or actual to the Award Amount

- a. If the sum of the disbursements does not equal the Award Amount, the award rejects with error code 160.

## UPDATING AND ADJUSTING TEACH GRANT AWARDS

### BUSINESS RULES

1. The following fields are required for making TEACH Grant award adjustments:

- a. Financial Award Type
- b. Financial Award Year
- c. Financial Award Number
- d. Financial Award Amount

- e. Financial Award ID
- 2. The COD System does not accept a change record with an award amount that is less than the sum of accepted funded disbursements (Edit 041).
- 3. The COD System will allow a change to the Student Level Code of an existing award.
  - a. If the Teacher Expert Indicator is set to true and the new student level code is less than 6, the change will reject (Edit 164)
- 4. The COD system will allow changes to the award amount.
  - a. If the change submitted will result in an award amount greater than \$4000, the change will reject.
  - b. If the change submitted will result in an award amount less than the sum of the actual disbursements (DRI= true) for the award, the change will be rejected.

## DISBURSEMENT SEQUENCE NUMBER REQUIRED ON ALL DISBURSEMENTS

A Disbursement Sequence Number must be reported for all disbursements. This is an indicator of a single transaction associated with a specific disbursement number.

### BUSINESS RULES

- 1. The Disbursement Sequence Number determines the order in which the transaction must be processed for a given Disbursement Number.
- 2. The Disbursement Sequence Number must be reported in an incremental, ascending order.
- 3. The Disbursement Sequence Number valid values range from 1-99.
  - a. Disbursement Sequence Numbers 1-65 are reported by schools.
  - b. Disbursement Sequence Numbers 66-90 are reserved for COD system-generated adjustments to actual disbursements and actual disbursement information submitted online via the [COD Website](#).
  - c. Disbursement Sequence Numbers 91-99 are reserved.
- 4. The Disbursement Sequence Number must be reported as "01" when the Disbursement Release Indicator is set to false.
- 5. When resubmitting a disbursement transaction that was rejected, the resubmission must use the same Disbursement Sequence Number that was rejected, unless the record was rejected for incorrect sequence number.

6. The COD System will allow a change to the Student Level Code of an existing award.
  - a. If the Teacher Expert Indicator is set to true and the new student level code is less than 6, the change will reject (Edit 164)
7. The COD system will allow changes to the award amount.
  - a. If the change submitted will result in an award amount greater than \$4000, the change will reject.
  - b. If the change submitted will result in an award amount less than the sum of the actual disbursements (DRI= true) for the award, the change will be rejected.

## SUBMITTING TEACH GRANT DISBURSEMENT INFORMATION AND DISBURSEMENT RELEASE INDICATOR

The COD System can accept TEACH Grant Disbursement information in advance of, on, or after the disbursement date.

### BUSINESS RULES

1. Disbursement Date is defined as the date the disbursement should be funded.
2. The COD System must accept an Award Amount greater than zero (\$0) before it can accept Disbursement information for that student.

Award and Disbursement information can be submitted and accepted in the same transmission.

3. TEACH Grant Award or Disbursement Amounts cannot equal zero on the first submission.
4. Disbursement Date may range from 2024-10-01 (October 1, 2024) to 2026-09-30 (September 30, 2026).

The earliest date on which an institution may disburse a TEACH Grant, either with Federal funds or its own funds, is January 1, 2025 for the 2025- 26 Award Year.

5. The COD System accepts Disbursement information for anticipated disbursements (DRI = false) and actual disbursements (DRI = true).
  - a. The required disbursement data elements to process an anticipated TEACH Grant disbursement are:
    - Disbursement Number, <Disbursement Number= " ">
    - Disbursement Amount, <DisbursementAmount>

- Disbursement Date, <DisbursementDate>
- Disbursement Release Indicator set to false,  
<DisbursementReleaseIndicator>>false</DisbursementReleaseIndicator>
- Disbursement Sequence Number, <DisbursementSequenceNumber>
- Enrollment Status <EnrollmentStatus>
- Program CIP Code <ProgramCIPCode>
- Program CIP Code Year <ProgramCIPCodeYear>

b. The required disbursement data elements to process an actual TEACH Grant disbursement are:

- Disbursement Number, <Disbursement Number= " ">
- Disbursement Amount, <DisbursementAmount>
- Disbursement Date, <DisbursementDate>
- Disbursement Release Indicator set to true,  
<DisbursementReleaseIndicator>>true</DisbursementReleaseIndicator>
- Disbursement Sequence Number, <DisbursementSequenceNumber>
- Enrollment Status <EnrollmentStatus>
- Program CIP Code <ProgramCIPCode>
- Program CIP Code Year <ProgramCIPCodeYear>

6. An active Agreement must be linked on the COD System before the COD System will accept actual disbursements (DRI =true)

- a. COD system will return a disbursement level reject edit if an actual disbursement (DRI =true) is submitted and the TEACH award it is associated with is not linked to an active Agreement on the COD System for that award year.
- b. The COD system will accept anticipated disbursements (DRI =false) even if an active Agreement is not on the COD System.

7. When reporting a disbursement adjustment to the COD System, the new Disbursement Amounts must be reported rather than the amount of the reduction or increase to the existing Disbursement Amount.

8. Depending on the funding method employed by the school, the COD System may accept Disbursement information in advance of, on, or after the disbursement date.
  - a. Schools designated as Advance Funded may submit a Disbursement Release Indicator set to true up to seven (7) calendar days before the Disbursement Date.
    - If the current date is more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with (Edit 51).
    - If the current date is not more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement.
  - b. Schools placed on Cash Monitoring 1 (HCM1) review status by the School Participation Team may submit a Disbursement Release Indicator set to true up to 7 calendar days before the disbursement date.
    - If the current date is more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with (Edit 51).
    - If the current date is not more than seven (7) calendar days before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement.
  - c. Schools designated as in the Reimbursement or Cash Monitoring 2 (HCM2) review status can submit a Disbursement Release Indicator set to true if the current date is equal to or after the Disbursement Date.
    - If the current date is before the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System rejects the disbursement with (Edit 51).
    - If the current date is equal to or after the Disbursement Date and the Disbursement Release Indicator is set to true, the COD System accepts and posts the disbursement upon review of documentation by the School Participation Team.
9. The COD rejects an actual disbursement amount if the sum of the student's disbursements exceeds the award amount for that award.

## UPDATING AND ADJUSTING TEACH GRANT DISBURSEMENT AMOUNTS AND DATES

Disbursement Amounts and Dates must be changed using the same disbursement number, rather than reporting a new disbursement number.

### BUSINESS RULES

1. To change a Disbursement Amount and/or Disbursement Date, the following data elements are required:
  - a. Disbursement Release Indicator, <DisbursementReleaseIndicator>

- b. Disbursement Number, <Disbursement Number= "">
  - c. Disbursement Sequence Number, <DisbursementSequenceNumber>
  - d. Disbursement Amount, <DisbursementAmount>
  - e. Disbursement Date, <DisbursementDate>
  - f. Enrollment Status <EnrollmentStatus>
  - g. Program CIP Code <ProgramCIPCode>
  - h. Program CIP Code Year <ProgramCIPCodeYear>
2. When changing a disbursement already reported to COD, the same Disbursement Number must be reported.
    - a. When changing a disbursement with a Disbursement Release Indicator = false, the Disbursement Sequence Number must be set to "1."
  3. When changing a disbursement that already has a Disbursement Release Indicator = true, the Disbursement Sequence Number must be unique. The next sequential Disbursement Sequence Number must be reported.
    - a. Disbursement Sequence Numbers for a specific Disbursement Number must be used in sequential order within the range of 1-65.

Schools cannot report a negative disbursement amount on a Common Record document. A replacement disbursement amount MUST be reported.

4. When changing the Disbursement Amount, the new Disbursement Amounts must be reported, rather than an adjustment to the existing Disbursement Amount.
5. Disbursement Date is always the date the cash was credited to the student's account or paid to the student directly for this specific Disbursement Number (Disbursement Sequence Number = 1). Disbursement Date is NOT the transaction date of the adjustment to the disbursement (Disbursement Sequence Number not equal to 1).

Although it is not required to report the transaction date to the COD System, schools are advised to keep it for their records.

6. Schools must submit adjustments to actual disbursements (Disbursement Sequence Number not equal to 1) within 15 days of the date the school becomes aware of the need to adjust a student's previously reported disbursement.
7. TEACH Grant disbursement amounts can be adjusted to \$0.
8. Disbursement dates and disbursement amounts can be changed on the same transaction.

# **Teacher Education Assistance for College and Higher Education (TEACH) Grant Program**

## **TEACH GRANT INITIAL AND SUBSEQUENT COUNSELING**

Students can complete a TEACH Grant Initial and Subsequent Counseling session on the StudentAid.gov Website.

### **BUSINESS RULES FOR TEACH GRANT INITIAL AND SUBSEQUENT COUNSELING**

1. Students must complete TEACH Grant Initial and Subsequent Counseling before they can sign their Agreement.
2. TEACH Grant Initial and Subsequent Counseling must be completed by the student each year that they receive a TEACH Grant award.

## **TEACH AGREEMENT**

The Agreement is the approved promissory note for TEACH grants for all schools. The Agreement can only be submitted electronically via the StudentAid.gov Website.

### **BUSINESS RULES FOR ALL AGREEMENTS**

1. An Agreement must be signed by the student before a school can disburse a TEACH grant.
  - a. An Agreement must be accepted on the COD System in order to allow actual disbursements to be accepted.
2. When students complete an Agreement, an Agreement Response is sent to the school the student selected while completing the Agreement.

## **LINKING AN AGREEMENT TO A TEACH AWARD**

The COD System links TEACH awards to an active Agreement for that Student.

### **BUSINESS RULES**

1. The COD System does not link an Agreement to an award if the award amount and all actual and anticipated disbursements equal zero.
2. The COD System initiates an Agreement linking process when an award amount on an unlinked award is increased from zero.



Schools should encourage students to list the same identifier information (i.e. complete formal name) used to file the FAFSA® on applications for all types of financial aid. An accepted award and valid Agreement will not link if the identifier information differs on the award and Agreement.

3. The COD System links an accepted TEACH grant to a valid Agreement using ALL of the following student data elements:
  - a. Current SSN
  - b. Current Date of Birth
  - c. First Two Character of the First name
    - i. If the TEACH grant exists on COD with no first name, then the first two characters of the last name
  - d. Award Year
4. When a TEACH grant is accepted and a valid Agreement is already on file, the Agreement and grant are linked.
  - a. The Agreement to Serve or Repay Status, Agreement To Serve or Repay Link Indicator, Agreement To Serve or Repay ID, and Electronic Agreement To Serve or Repay Indicator are generated on an Award Response.
5. When a TEACH grant is accepted and no valid Agreement is on file, the award is not linked and the Agreement To Serve or Repay Status on the Award Response equals 'R' (Rejected Agreement or valid Agreement not on file at COD).
6. When a TEACH grant is NOT accepted and there is a valid Agreement on file, the grant will not be linked to the Agreement. The Agreement To Serve or Repay Link Indicator (which equals false) and the appropriate Agreement To Serve or Repay Status (P = Pending or R = Rejected) will be returned in the Award Response.
7. When an Agreement is received and an accepted TEACH grant is already on file and not yet linked to an Agreement, the Agreement and the grant are linked.
  - a. The Agreement to Serve or Repay Status, Agreement To Serve or Repay Link Indicator, Agreement To Serve or Repay ID, and Electronic Agreement To Serve or Repay Indicator are returned on an Agreement Acknowledgement for the TEACH Grant.
8. When an Agreement is received and does not link to an accepted TEACH grant, the Agreement is not linked and an Agreement Acknowledgement is generated.
9. If a valid Agreement is on file and an accepted TEACH grant does not link (Agreement Status Code = P, Pending), the student identifier information on the award does not match the student identifier information on the Agreement. See EXAMPLE below. Schools should compare the student identifier information listed on the award and Agreement, and perform the following actions:
  - a. Update the student identifier information listed on the award origination via batch or web.

- b. Inactivate the award by reducing the award amount and all anticipated disbursements to zero (\$0.00). Originate a new award with student identifier information that matches that of the Agreement.

Student Robert Adams files a FAFSA® using his given name. The student identifier information Robert lists on the FAFSA® is pulled from FPS to create a valid Agreement. The student identifier information on the Agreement is as follows:

### Example

```
<Student>

  <Index>

    <SSN>999931101</SSN>

    <BirthDate>1987-04-15</BirthDate>

    <LastName>ADAMS</LastName>

  </Index>

  <Name>

    <FirstName>ROBERT</FirstName>

    <LastName>ADAMS</LastName>

  </Name>

</Student>
```

Robert then applies for a TEACH grant using his common first name, Bob. The student identifier information on the award is as follows:

```
<Student>

  <Index>

    <SSN>999931101</SSN>

    <BirthDate>1987-04-15</BirthDate>

    <LastName>ADAMS</LastName>
```

```
</Index>

<Name>

    <FirstName>BOB</FirstName>

    <LastName>ADAMS</LastName>

</Name>

</Student>
```

The COD System attempts to match the student identifier information contained on the award with the student identifier information of a valid Agreement on file at COD. Since the first two letters of the student's first name listed on the award do not match the first two letters of the student's first name listed on the Agreement, the award and Agreement do not link. The COD System is unable to find the appropriate Agreement with which to link the award and returns the Agreement Status Code of R (Rejected) on the Award Response.

## GENERATING AN AGREEMENT ACKNOWLEDGEMENT

An Agreement Acknowledgement is generated by COD and sent to a school to provide the status of an Agreement. The COD System sends Agreement Acknowledgements to the school associated with the Agreement.

### BUSINESS RULES

1. Agreement Acknowledgements are sent to the Attended school.
2. Agreement Acknowledgements won't be sent to a school under the following conditions:
  - a. The awards(s) from that school linked to the Agreement has (have) been reduced to \$0.
    - i. The school has confirmed that it has completed processing (confirmed closeout) for the TEACH Grant award year indicated on the Agreement or in the award record(s) from that school and the school has no award linked to that Agreement in a year that is still "open."
    - ii. FSA has confirmed that the school has completed processing (confirmed closeout for the school) for the TEACH Grant award year indicated on the Agreement or in the award record(s) from that school and the school has no award linked to that Agreement in a year that is still "open."
    - iii. The date is beyond the annual processing deadline (closeout deadline) for the TEACH Grant award year indicated on the Agreement or in the award record(s) from that school and the school isn't on Extended Processing and the school has no award linked to that Agreement in a year that is still "open." The TEACH data submission deadline is the last processing date of

September following the end of the award year (i.e. for 2025-26 the closeout deadline would be September 30, 2026).

3. Schools will receive Agreement Acknowledgements when the conditions above don't exist and:
  - a. COD accepts an Agreement and there are no existing awards.
  - b. COD accepts an Agreement and at least one award exists. The award(s) and Agreement link.
  - c. COD accepts an award and the Agreement exists. The award and the Agreement link.
    - i. The Agreement Acknowledgement is sent to the school where the award originated.
  - d. The Agreement Acknowledgement will be sent to all schools associated with the Agreement that have active awards (Award Amount and Disbursement Amounts > \$0) or were listed on the Agreement.
    - i. If the school specified on the Agreement is the same as the school where an active award originated, the school will not receive a separate acknowledgement.
    - ii. Agreement Acknowledgement sent to schools that do not have an award linked to their Agreement, but the Agreement is linked to an award from another school, will not receive the <AgreementToServeLinkIndicator> tag.
  - e. Award (active or inactive) and Agreement exist on COD System and are unlinked. The Agreement and award are manually linked.

The COD System does not generate Responses when an Agreement is manually unlinked from an award or an Agreement is unlinked due to a re-link of an award.

- i. The Agreement Acknowledgement will be sent to the school where the award was originated.
  - f. Award and Agreement exists on COD System and are unlinked. Agreement and award are linked through SSIM.
    - i. The Agreement Acknowledgement will be sent to the school where the award was originated.
4. A COD system-generated Agreement Acknowledgement contains a Document Type of AT. The Document Type indicates the type of Response.
5. A Response Document of Document Type AT contains a system-generated Document ID.
6. An Agreement Acknowledgement contains the following data elements in the Response complex element <Response>:
  - a. Document Status, <DocumentStatusCode>
  - b. Document Type, <DocumentTypeCode>

c. Processing Date, <ProcessDate>

7. The following data elements are in all Agreement Acknowledgements:

a. Agreement Status, <AgreementToServeStatusCode>

b. Agreement Link Indicator, <AgreementToServeLinkIndicator>

c. Agreement ID, <AgreementToServeID>

d. Electronic Agreement Indicator <ElectronicAgreementToServeIndicator>

8. A Pending Agreement is an accepted Agreement, which cannot yet be linked with an award record. (No accepted Origination record on file.)

9. Acknowledgements are sent for discharge reversals.

## TEACH GRANT CLOSEOUT

The COD System provides the ability for schools to perform end of program year closeout activities for Award Year 2016-17 and forward.

The TEACH data submission (closeout) deadline is the last processing date of September following the end of the award year (i.e. for 2025-26 the closeout deadline would be September 30, 2026. This is the last processing day of the program year, so all school data must be received and accepted by this date in order to be included in a school's final Ending Cash Balance for the year.

## BUSINESS RULES

1. When a school's internal ending cash balance and unbooked balances are \$0, it is in agreement with the ending cash balance reflected in the school's most recent TEACH Grant School Account Statement (SAS) for the award year, and the school has no outstanding issues for this program year, the school should complete the School Balance Confirmation Form in COD Web. Once the school has successfully confirmed closeout the following actions will occur:
  - a. The Department will send a Program Year Closeout letter to the school's President and Financial Aid Director.
  - b. COD will reject award and disbursement increases and new disbursements per published edits.
  - c. The Department will reduce the school's Current Funding Level (CFL) to the greater of Net Drawdowns or Net Accepted & Posted Disbursements.
  - d. The SAS report for this award year and program will no longer be sent.

**Note:** After successfully confirming close out, if the school needs to submit award or disbursement increases or new disbursements in the future, they must request to be reopened or placed on extended processing via the Request Reopen/Extended Processing page on the COD Website.

2. COD will send out the following correspondence:
  - a. **Balance Notification Letter:** Sent to schools as a reminder to finish processing and confirm closeout before the established data submission deadline.
  - b. **Program Year Closeout Letter:** Sent to schools once they have completed the balance confirmation process and are considered closed out for the requested program and award year. This includes completing the School Balance Confirmation Page via the COD Website and verifying their ending cash balance and unbooked loans balances haven't changed.
  - c. **Reopen Change Letter:** Sent to schools to notify them that they are no longer considered confirmed closed out for the award year because:
    - i. The school's balances in the Common Origination and Disbursement (COD) System have changed and/or
    - ii. Staff at school has requested to be reopened to continue processing via the Request Reopen/Extended Processing page on the COD Website.
  - d. **Extended Processing Letter:** Sent to schools that have been approved for an extension to the data submission deadline. Notifies the school of the expiration date of that extension.

**Note:** Schools can find a HTML copy of the above correspondence on the School Correspondence page via the COD Website.

## User Readiness Checklist

1. Obtain your Routing Number (formerly Common School Identifier) from COD School Relations or the COD Website.
2. Communicate your Routing Number to your software vendor, third-party servicer, or state agency, as needed.
3. Contact COD Customer Service or review the COD Website to verify that your Reporting, Attending, and Funding School Relationships are set in COD accurately.
4. Contact COD Customer Service or review the COD Website to verify that the Funding Method for your school is set in COD accurately.
5. Reference Volume 2 of the COD Technical Reference for information on how to modify school or software provider applications to create Common Record files in XML format.
6. Reference Volume 5 of the COD Technical Reference for information on COD School Testing.

7. Obtain a COD School Administrator User ID for the COD Website. (Reference the “COD User ID Setup for Website” announcement on Knowledge Center for more information).
8. Establish User IDs within your organization for access to the COD Website (to be completed by the organization’s Security Administrator).
9. Establish Rules of Behavior documents related to use of the COD System

The COD System does not generate Responses when an Agreement is manually unlinked from an award or an Agreement is unlinked due to a re-link of an award.

10. Access the COD Website to:
  - a. Update your School Processing Options, as needed.
  - b. Review COD Processing Updates.
  - c. Review COD FAQs.
  - d. Review COD Web Messages.
  - e. Ensure your school contact information is accurate.

## School Processing Options

School Processing Options are parameters or criteria that are set by the school and dictate how the COD System processes school data. Schools must confirm that these school processing options are set appropriately for each award year prior to submitting data for that award year to COD for processing.

Any questions related to the following school processing options should be directed to the COD School Relations Center at the following phone number or email address:

- (800) 848 - 0978
- [CODSupport@ed.gov](mailto:CODSupport@ed.gov)

## PROMISSORY NOTE TYPE OPTION

This option determines whether the single-year or multi-year feature is applied to a Promissory Note for each award year. Schools eligible to use the multi-year feature can choose to issue single-year or multi-year promissory notes.

For more information regarding eligibility for the MY MPN feature see the Dear Colleague Letter GEN-02-10 (November 2002) and DLB-03-02.

### BUSINESS RULES

1. This option applies to Direct Loan schools only.
2. The values for this option are “single-year” or “multi-year.”
3. “Single-Year” signifies the borrower must submit a promissory note for each academic year for that specific school.
4. “Multi-Year” signifies the school may allow the borrower to receive loans for subsequent academic years based on a previously signed MPN.
5. All schools are now eligible for the MY feature.
6. New schools to the Direct Loan program will be defaulted to use the MY feature in the COD system
7. Direct Loan schools may update this option by contacting COD Customer Service.

## ENTRANCE COUNSELING PARTICIPATION OPTION

Schools have the option to participate in the Direct Loan Entrance Counseling process available on the StudentAid.gov Website.

**Note:** Entrance Counseling has been available to borrowers on StudentAid.gov since March 2010. This option will allow schools to determine if their school will participate in the Entrance Counseling option available on StudentAid.gov.

### BUSINESS RULES

1. The Entrance Counseling Participation Option is NOT award year specific.
2. Schools may update this option by visiting the School Options page on the COD Website.
3. This option applies to Direct Loan schools only



4. The valid values for the Participate in the Entrance Counseling Participation Option are 'Y' or 'N'.
5. 'Y' signifies that schools will participate in the Entrance Counseling process.
6. 'N' signifies that schools will not participate in the Entrance Counseling process.

## ENTRANCE COUNSELING RESPONSE OPTION

Beginning in March 2013, schools have the option to determine the frequency of how often they receive Entrance Counseling System Generated Responses.

### BUSINESS RULES

1. Schools may update this option by visiting the School Options page on the COD Website.
2. This option applies to Direct Loan schools only
3. If a school has elected not to participate in electronic Entrance Counseling, that school will not be able to select an Entrance Counseling response frequency.
4. The valid values for Response Frequency are 'On-Demand' or 'Daily'
  - a. 'On-Demand' signifies that the school will request their Entrance Counseling responses via the COD Website
  - b. 'Daily' signifies that the school will receive their Entrance Counseling responses daily

## EXIT COUNSELING RESPONSE OPTION

Beginning in March 2013, schools have the option to determine the frequency of how often they receive Exit Counseling System Generated Responses

### BUSINESS RULES

1. Schools may update this option by visiting the School Options page on the COD Website.
2. This option applies to Direct Loan schools only
3. The valid values for Response Frequency are 'On-Demand' or 'Daily'

- a. 'On-Demand' signified that the school will request their Exit Counseling responses via the COD Website.
- b. 'Daily' signifies that the school will receive their Exit Counseling responses daily

## FINANCIAL AWARENESS COUNSELING RESPONSE OPTION

This feature was retired on StudentAid.gov starting November 2021.

Beginning in June 2012, schools have the option to determine their Financial Awareness Counseling Response frequency

### BUSINESS RULES

1. Schools may update this option by visiting the School Options page on the COD Website.
2. This option applies to Direct Loan schools only
3. The valid values for Response Frequency are 'On-Demand' or 'Daily'
  - a. 'On-Demand' signifies that the school will request their responses via the COD Website
  - b. 'Daily' signifies that the school will receive responses daily
  - c.

## STUDENTAID.GOV ASSOCIATED STATES OPTION

Schools have the option to select under which states their school name will appear on all StudentAid.gov process in which the school participates.

### BUSINESS RULES

1. The Associated States Option is NOT award year specific.
2. Schools may update this option by visiting the Schools Option page on the COD Website.
3. This option applies to Direct Loan schools only.
4. Schools must be associated with a minimum of one state.
5. Additional location schools will not be able to select multiple states. Additional location schools will inherit their associated state from the main address of the additional location school.

## STUDENTAID.GOV SCHOOL NAME DISPLAY OPTION

Schools have the option to modify how their school's name is displayed as a part of the StudentAid.gov processes.

### BUSINESS RULES

1. The School Name Display Option is NOT award year specific.
2. Schools can update this option by visiting the School Options page on the COD Website.
3. The modified school name will apply to all StudentAid.gov processes.
4. This option applies to Direct Loan Schools only.

## STUDENTAID.GOV PLUS APPLICATION AWARD RANGE OPTION

Beginning in July 2011 and forward, schools have the option to input default Award Range which borrowers will select as part of the PLUS Loan Request Process.

### BUSINESS RULES

1. The PLUS Application Participation Option(s) is award year specific.
2. Schools can enter/update the Award Range begin and end dates by visiting the School Options page on the COD Website.
3. The value will be defaulted to the first day of the month. For example, if August 2012 to July 2013 is selected as the date range, the award request range will be stored into the COD system as August 1, 2012 to July 1, 2013.
4. Schools may enter up to 4 Award Range Begin and End Dates.
5. Schools will have the option to have a value of 'Other' displayed to borrowers completing a PLUS Application for their school
6. If a school has selected not to have 'Other' as a valid award range for their school, then at least one valid award range must be entered.
7. This option applies to Direct Loan Schools only.

## PLUS APPLICATION PARTICIPATION OPTION

This processing option determines if a school participates in the Direct PLUS Loan application process available on StudentAid.gov. Schools can also establish their PLUS loan application participation begin and end dates.

### BUSINESS RULES

1. The PLUS Application Participation Option(s) is award year specific.
2. This option applies to Direct Loan Schools only.
3. The valid values for the Participate in the PLUS Application are 'Y' or 'N'.
4. 'Y' signifies that schools will participate in the PLUS Application process.
5. 'N' signifies that schools will not participate in the PLUS Application process.
6. Schools can select their PLUS Application Participation Begin Date and End Dates. NOTE: The COD System will increment the PLUS Application Begin Date and End Dates by one year with the implementation of a new award year.
7. If a school selects a PLUS Application Participation Begin date which is in the future, users will not be able to complete a PLUS Application for that school via StudentAid.gov
8. Schools may select different options for the Parent PLUS Application and the Grad PLUS Application.
9. Direct Loan schools may update this option via the School Options page on the COD Website.

## PLUS APPLICATION ACKNOWLEDGEMENT OPTION

This processing option determines how often a school will receive PLUS Application Responses. Schools that do not participate in the PLUS Application process will not receive PLUS Application Responses.

### BUSINESS RULES

1. The PLUS Application Responses Option is award year specific.
2. This option applies to Direct Loan schools only.
3. The values for this option are "daily" or "on demand."

4. “Daily” signifies schools will receive PLUS Application Responses on a daily basis.
5. “On Demand” signifies that schools will be required to visit the ‘PLUS Application Response Requests’ page on the COD Website to
6. request their PLUS Application Responses be sent to them.
7. New schools to the Direct Loan program will be defaulted to the ‘daily’ option.
8. Direct Loan schools may update this option via the School Options page on the COD Website.

## DISCLOSURE STATEMENT PRINT OPTION

This processing option determines whether the school prints its own disclosure statements or allows the COD System to generate the Disclosure Statement upon receipt of the required information for each award year.

### BUSINESS RULES

1. This option applies to Direct Loan schools only.
2. The Disclosure Statement Print Code tag on the Origination Record and Common Record allows a school to decide at the individual student loan level who is responsible to print the disclosure statement for a specific loan and overrides the selected school option.
3. The Disclosure Statement Print Code tag can also be used to request the COD System to reprint a disclosure statement.
4. If an award does not contain the Disclosure Statement Print Code, the COD System defaults to the option on the school profile when processing the award.
5. Direct Loan schools may update this option at any time on the COD Website.
6. The values for this option are Y or N.
  - a. Y Signifies that COD prints.
  - b. N Signifies that school prints.

## ADMINISTRATIVE COST ALLOWANCE OPTION

This processing option determines whether or not the school will receive the Pell Administrative Costs Allowance (ACA) for each award year.

### BUSINESS RULES

1. This option applies to Pell Grant Schools only.
2. The values for this option are Y or N.
  - a. Y Signifies that the school will receive the ACA.
  - b. N Signifies that the school will not receive the ACA.
3. Pell Grant schools may contact COD School Relations to request that FSA updates this option.

## PELL GRANT ERROR PROCESSING OPTION

This processing option determines whether the COD System rejects or corrects certain Pell Grant data elements that do not pass edits.

Direct Loan schools do not have the option to choose between correcting vs rejecting processing options

### BUSINESS RULES

1. This option applies to Pell Grant Schools only.
2. The values for this option are Rejected or Corrected.
3. Rejected signifies that the COD System will reject certain Pell Grant data elements that do not pass edits.
4. Corrected signifies that the COD System will correct certain Pell Grant data elements that do not pass edits.
5. The default for this option is Corrected.
6. Pell Grant schools may contact COD School Relations to request that FSA updates this option.

**NOTE:** The program options on School Options Information page for Pell will no longer drive the processing options for Iraq and Afghanistan Service Grant except for Error Processing Options. The IASG Program has been retired for the 2024-25 Award Year.

## FULL OR STANDARD RESPONSE

This processing option determines whether the COD System returns to the school a Full or Standard Response to Common Records processed by the COD System.

### BUSINESS RULES

1. A Full Response contains all the original tags sent by the School and the rejected data elements and reason codes.
2. A Standard Response contains only the rejected data elements and reason codes.
3. This option defaults to a Standard Response.

EDEXpress users always receive a Full Response regardless of their selected response option.

4. Schools can override this option on a record-by-record basis by submitting the `<FullResponseCode>` tag on the Common Record.
5. If the `<FullResponseCode>` tag is not sent, the option defaults to Standard Response.

## RESPONSE RECORDS GENERATED BASED ON WEB ACTIVITIES

This processing option determines whether the COD System sends Response Documents to the school's SAIG mailbox based on activity performed on the COD Website. This activity includes processing a new student, award or disbursement, or a change to any of these on the COD Website.

### BUSINESS RULES

1. The values for this option are Y or N.
2. Y signifies that the COD System will send a Response Document to the school's SAIG mailbox based on activity performed on the COD Website.
3. N signifies that the COD System will not send a Response Document to the school's SAIG mailbox based on activity performed on the COD Website.
4. The default for this option is N.
5. Schools may update this option at any time on the COD Website.
6. If the school selects to receive a Response Document for activity performed on the COD Website, the Document Type is WB indicating a web-initiated response

7. The <DisbursementSequenceNumber> is 66-90 for the Response with a Document Type of WB.
8. The <PreviousSequenceNumber> tag is returned on the Response with a Document Type of WB to indicate the previous accepted Disbursement Sequence Number on the COD system for this Disbursement Number.

## COMMON RECORD RESPONSE DOCUMENT LENGTH OPTION

Schools have the option to receive Response Documents with one tag set per line or a specified maximum number of bytes per line up to 9,999 bytes.

Schools are encouraged to discuss this option with their software vendors before electing to make any changes to the default. The school's software must be prepared to accept Response of the new length.

### BUSINESS RULES

1. The default for this option is one tag set per line.
2. Schools may choose to change the default to a specified maximum number of bytes per line, up to 9,999 bytes per line.
  - a. The minimum allowed bytes per line is the length of the longest tag in the Common Record XML Schema.
3. Schools must contact COD School Relations to request that this option be updated.



# Section 2:

## Document Standards

The Message Class table describes the message classes that are to be used for sending and receiving data to and from the COD System. Message classes that end in an IN are for documents exported from a school system to the COD System. Message classes that end in an OP are for documents imported to a school system from the COD System.

## Common Record Message Classes

The Common Record Message Class tables describe the message classes that are used when sending and receiving Common Record documents to and from the COD System.

Users are able to choose the message class in which they send and receive documents to and from the COD System. Message class options include the following:

- Non-program specific and non-award year specific. Example: COMRECIN, COMRECOP
  - Non-program specific and award year specific (2025-26).
- Program specific (Pell, Direct Loan, and TEACH Grant) and non-award year specific.
  - Program specific (Pell, Direct Loan, TEACH Grant, Iraq and Afghanistan Service Grant) and award year specific (2025-26).

Schools do not need to use all the message classes listed in the table below. Use of these message classes will vary by school based on the schools' business processes and system software. For school-initiated Common Records, schools can specify message class options when submitting documents. The COD System will return document responses in the OP message class that corresponds to the IN message class used to submit the document to the COD System.

Schools will not be locked into a specific message class upon initial document submission. Instead, schools will be able to change message classes with each document submission to the COD System. For COD System Generated Responses, OP message classes used by the COD System will differ for each type of system generated response and will contain a year indicator where applicable.

The COD System will not validate the content of the Common Record document with the message class type used for submission. For example, schools can submit Pell Grant data for the 2025-26 Award Year in the Direct Loan specific, non-award year specific message class, CRDLMYIN. The document will be processed by the COD System and the response will be returned in the corresponding OP message class CRDLMYOP. If the document content does not correspond to the IN message class used for submission, the COD System will not determine the appropriate content specific message class in which to return the document response. Message class specificity is merely a mechanism that schools can use to differentiate between documents they have submitted to the COD System.

## Non-Program Specific

### NON-PROGRAM SPECIFIC, NON-AWARD YEAR SPECIFIC

Message Class	Data Description	Destination Mailbox
COMRECIN	Common Record Documents containing data from any or multiple programs for any or multiple award years sent from school to COD System.	To TG71900
COMRECOP	Responses containing data from any or multiple programs for any or multiple award years sent from COD System.	From TG71900

Table 52

### NON-PROGRAM SPECIFIC, AWARD YEAR SPECIFIC

Message Class	Data Description	Destination Mailbox
CRAA26IN	Common Record Documents containing data from any or multiple programs for the 2025-26 Award Year sent from school to COD System.	To TG71900
CRAA26OP	Responses sent from COD System to school for data received in the CRAA26IN message class.	From TG71900

Table 53

## Program Specific, Non-Award Year Specific

### PELL MESSAGE CLASSES

Message Class	Data Description	Destination Mailbox
CRPGMYIN	Common Record Documents containing Pell Grant data for any or multiple award years sent from school to COD System.	To TG71900
CRPGMYOP	Responses sent from the COD System to schools for Pell Grant data received in the CRPGMYIN message class.	From TG71900
PGLETXOP	Text files sent from the COD System to schools for Pell Grant dispute data.	From TG71900

Table 54

### DIRECT LOAN MESSAGE CLASSES

Message Class	Data Description	Destination Mailbox
CRDLMYIN	Common Record Documents containing Direct Loan data for any or multiple award years sent from school to COD System.	To TG71900
CRDLMYOP	Responses sent from COD System to school for Direct Loan data received in the CRDLMYIN message class.	From TG71900

Table 55

## TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUCATION (TEACH) GRANT MESSAGE CLASSES

Message Class	Data Description	Destination Mailbox
CRTHMYIN	Common Record Documents containing TEACH Grant data for any or multiple award years sent from school to COD System.	To TG71900
CRTHMYOP	Responses sent from COD System to school for TEACH Grant data received in the CRTHMYIN message class.	From TG71900

Table 56

## NON-CREDENTIAL TEACHER CERTIFICATION PROGRAM MESSAGE CLASS

Message Class	Data Description	Destination Mailbox
NCTCMYIN	School submitted comma delimited files containing Non-Credential Teacher Certification Program data for award years prior to 2015-16.	To TG71900

Table 57

## Program Specific, Award Year Specific

### PELL MESSAGE CLASSES FOR 2025-2026 DATA

Message Class	Data Description	Destination Mailbox
CRPG26IN	Common Record Documents containing Pell Grant data for 2025-25 Award Year sent from school to COD System.	To TG71900
CRPG26OP	Responses sent from COD System to school for Pell Grant data for 2025-26 Award Year received in the CRPG26IN message class.	From TG71900

Table 58

### DIRECT LOAN MESSAGE CLASSES FOR 2025-2026 DATA

Message Class	Data Description	Destination Mailbox
CRDL26IN	Common Record Documents containing Direct Loan data for 2025-26 Award Year sent from school to COD System.	To TG71900
CRDL26OP	Responses sent from COD System to school for Direct Loan data for 2025-26 Award Year received in the CRDL25IN message class.	From TG71900

Table 59

## TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUCATION (TEACH) GRANT MESSAGE CLASSES FOR 2025-2026 DATA

Message Class	Data Description	Destination Mailbox
CRTH26IN	Common Record Documents containing TEACH Grant data for 2025-26 Award Year sent from school to COD System.	To TG71900
CRTH26OP	Responses sent from COD System to school for TEACH Grant data for 2025-26 Award Year received in the CRTH25IN message class.	From TG71900

Table 60

## System-Generated Responses for 2025-2026

Message Class	Data Description	Destination Mailbox
CRBN26OP	Booking Notification	From TG71900
CRND26OP	Negative Disbursement	From TG71900
CRPS26OP	Payment to Servicing	From TG71900
CRPN26OP	MPN Response	From TG71900
CRAT26OP	Agreement Response	From TG71900
CRAC26OP	TEACH Grant Counseling Response	From TG71900
CRWB26OP	Responses for activity performed on the COD web site for the 2025-26 Award Year	From TG71900
CRSP26OP	DL PLUS Application Response	From TG71900
CRECMYOP	DL Entrance Counseling, , and Exit Counseling	From TG71900
CROF26OP	Origination Fee and Interest Rebate Percentage Response	From TG71900
CRCS26OP	Credit Status Response	From TG71900
CRIB26OP	Informed Borrowing Confirmation Response	From TG71900

Table 61

**SULA Calculation Response**

The message class designate for System-Generated responses for the SULA Calculation Response will not be used beyond Award Year 2021-22. CRSUXXOP will not be generated for the 2022-23 Award Year and forward.

## Report Message Classes

### PELL GRANT REPORT MESSAGE CLASSES

The Pell Grant Report message class table describes the message classes that can be used to send and receive data to and from the COD System.

**Note:** Reports containing data for a specific award year will be sent in award year specific message classes. Reports will be sent for all prior award years using the associated year in the message class.

### EXPORTS TO COD SYSTEM

Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
PGRQ26IN	#R	Pell Data Requests	125	To TG71900

Table 62

### IMPORTS FROM COD SYSTEM

Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
PGRA26OP	#R	Pell Data Request Response	150	From TG71900
PGAS26OP	#A	Pell Electronic Statement of Account (ESOA)	200	From TG71900
PGMR26OP	#M	Pell Multiple Reporting Record (MRR)	450	From TG71900
PGRC26OP	#C	Pell Reconciliation Report	100	From TG71900
PGYR26OP	#Y	Pell Year-to-Date Record	350	From TG71900
PGTX26OP	#T	Pell Text File	80	From TG71900
PGPE26OP	#U	Pell Pending Disbursement List Report	80	From TG71900
PGVS26OP	#V	Pell Verification Status Report	80	From TG71900
PGPO26OP	#Z	Pell POP Report	80	From TG71900



Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
PGLE26OP	#L	Pell LEU Report	Variable	From TG71900
PGSM26OP	PD	Pell Grant School Account Statement (Monthly Disbursement Level Detail)	Variable	From TG71900
PGSY26OP	PW	Pell Grant School Account Statement (Year-to-Date Disbursement Level Detail)	Variable	From TG71900
PGSA26OP	PL	Pell Grant School Account Statement (Year-to-Date Award Level Disbursement Summary)	Variable	From TG71900
PSOM26OP	PB	Pell Grant School Account Statement Disbursement Detail on Demand (Month-to-Date)	Variable	From TG71900
PSOY26OP	PF	Pell Grant School Account Statement Disbursement Detail on Demand (Year-to-Date)	Variable	From TG71900
PSOR26OP	PH	Pell Grant School Account Statement Disbursement Detail on Demand (Date Range)	Variable	From TG71900

Table 63

## DIRECT LOAN REPORT MESSAGE CLASSES

The Direct Loan Report message class tables describe the message classes that can be used to receive data from Servicing and the COD System.

**Note:** Reports containing data for a specific award year will be sent in award year specific message classes. Reports will be sent for all prior award years using the associated year in the message class.

## IMPORTS FROM COD SYSTEM

Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
CODRBFOP	RB	Direct Loan Rebuild Loan File (on demand)	1200	From TG71900
DLPD26OP	#R	Pending Disbursement List (Anticipated Disbursement Listing)	Variable	From TG71900
DUPLCDOP	DS	Duplicate Student Borrower Report	Variable	From TG71900

Table 64

**IMPORTS FROM COD SYSTEM, CONTINUED**

<b>Message Class</b>	<b>Batch ID</b>	<b>Data Description</b>	<b>Record Length</b>	<b>Destination Mailbox</b>
DSDD26OP	AS	Direct Loan School Account Statement (Comma-Delimited with Headers, Disbursement Level Loan Detail)	Variable	From TG71900
DSDF26OP	AS	Direct Loan School Account Statement (Fixed-Length, Disbursement Level Loan Detail)	450	From TG71900
DSL26OP	AS	Direct Loan School Account Statement (Comma-Delimited with Headers, Loan Level Loan Detail)	Variable	From TG71900
DSLF26OP	AS	School Account Statement (Fixed- Length, Loan Level Loan Detail)	450	From TG71900
DSMF26OP	AS	Direct Loan School Account Statement Disbursement Detail On Demand (Month-to-Date, Fixed Length)	450	From TG71900
DSMH26OP	AS	Direct Loan School Account Statement Disbursement Detail On Demand (Month-to-Date, Comma Delimited with Headers)	Variable	From TG71900
DSYF26OP	AS	Direct Loan School Account Statement Disbursement Detail On-Demand (Year-to-Date, Fixed Length)	450	From TG71900
DSYH26OP	AS	Direct Loan School Account Statement Disbursement Detail On-Demand (Year-to-Date, Comma Delimited with Headers)	Variable	From TG71900
DSRF26OP	AS	Direct Loan School Account Statement Disbursement Detail On-Demand (Date Range, Fixed Length)	450	From TG71900
DSRH26OP	AS	Direct Loan School Account Statement Disbursement Detail On-Demand Date Range, Comma Delimited with Headers)	Variable	From TG71900
MPNSTAOP	MS	MPN Status Report	Variable	From TG71900
DLAD260P	#E	Actual Disbursement List (Comma- Delimited)	Variable	From TG71900

Table 65

## TEACH GRANT REPORT MESSAGE CLASSES

The TEACH Grant Report message class table describes the message classes that can be used to send and receive data to and from the COD System.

**Note:** Reports containing data for a specific award year will be sent in award year specific message classes. Reports will be sent for all prior award years using the associated year in the message class.

### IMPORTS FROM COD SYSTEM

Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
THRB26OP	TR	TEACH Grant Rebuild File, Origination Detail Record	406	From TG71900
THRB26OP	TR	TEACH Grant Rebuild File, Disbursement Detail Record	422	From TG71900
THMR26OP	TM	TEACH Grant Multiple Reporting Record (MRR)	476	From TG71900
THPE26OP	TU	TEACH Grant Pending Disbursement List	Variable	From TG71900
THSM26OP	TS	TEACH Grant School Account Statement (Monthly)	Variable	From TG71900
THSY26OP	TW	TEACH Grant School Account Statement (YTD)	Variable	From TG71900
TSOM26OP	TS	TEACH Grant School Account Statement Disbursement Detail on Demand (Month-to-Date)	Variable	From TG71900
TSOY26OP	TW	TEACH Grant School Account Statement Disbursement Detail on Demand (Year-to-Date)	Variable	From TG71900
TSOR26OP	TC	TEACH Grant School Account Statement Disbursement Detail on Demand (Date Range)	Variable	From TG71900
ATSDISOP	TD	Agreement Discharge Report	146	From TG71900

Table 66

## TEACH EXIT COUNSELING REPORT MESSAGE CLASSES

The TEACH Exit Counseling Report message class tables describe the message classes that can be used to receive data from Servicing.

**IMPORT FROM SERVICING**

Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
THCMEXOP	XC	TEACH Grant Exit Counseling Results (Comma-Delimited)	Variable	From TG58647
THFFEXOP	XC	TEACH Grant Exit Counseling Results (Fixed-Length)	160	From TG58647
THFMEXOP	XC	TEACH Grant Exit Counseling Results (Pre-formatted)	160	From TG58647

Table 67

**NON-PROGRAM SPECIFIC REPORT MESSAGE CLASSES**

The Non-Program Specific Report message class table describes message classes that can be used for a report that includes data from multiple programs.

**IMPORTS FROM COD SYSTEM**

Message Class	Batch ID	Data Description	Record Length	Destination Mailbox
SCHMONOP	NA	COD School Monitoring Report	N/A	From TG71900

Table 68

# Section 3:

## Common Record Layout

## Introduction

This section provides the Common Record layout table, which lists the valid tags that can be used in XML Schema version 5.0c as well as their valid values. Additionally, this section provides standards for the physical layout of the Common Record XML Document file. Standards on the physical layout of the Common Record XML Document file are required to ensure all systems transmitting or processing an instance of the file can do so without encountering physical constraint errors.

This section provides the Common Record layout table, which lists block information grouped according to the following column headings:

- Field Number - Lists the Common Record field number
- COD Data Field – Contains the Common Record 2025-2026 tag name (Schema version 5.0c) and a description
- Minimum Length – Specifies the minimum length of the element
- Maximum Length – Specifies the maximum length of the element
- Nillable – Specifies whether or not the tag is nillable
- Data Type – Specifies the type of field (e.g. date, integer, string, boolean, etc.)
- Field Type – Specifies whether the field is a simple or complex element
- Complex Element Sequence – Specifies in which complex element and what order the tag is required to be submitted
- For example: <DLSubsidized> (5th element) means that the tag is the 5th possible tag in the DLSubsidized award block.
- It may not always be the 5th tag submitted, depending on whether the tags above it are required or optional but the tag will always come after tags 1, 2, 3, and 4 and before any tags listed as 6 or higher.
- Valid Field Values – Describes the acceptable content for a given Common Record element in order to pass XML schema validation
- Business Rules – Describes the acceptable content for a given Common Record element in order to pass various business rules

A brief note on Required vs. Optional tags in the XSD schema. Next to each complex or simple element in the XSD are additional details regarding if the element is required or optional. If minOccurs="0" is next to the element, then that complex or simple element is optional. If minOccurs="1" is next to the element, then that complex or simple element is required (also note that it is possible for elements to have maxOccurs="#", in this case the element can only occur the specified number of times per block). For instance, the Transmission Data element is required and is listed as follows:

**Required Fields**

Refer to the Minimum Data Elements Required for Document Processing topic in Volume 2, Section 1 – Implementation Guide for more information.

```
<xsd:element name="TransmissionData">
```

However, the ReportedFinancialSummary element is optional:

```
<xsd:element name="ReportedFinancialSummary" type="cod:ReportedFinancialSummaryType"
minOccurs="0" maxOccurs="120"/>
```

The ReportedFinancialSummary complex element is optional; however, if it is included, certain elements that pertain to the ReportedFinancialSummary type are required and some are optional (all complex elements within the Common Record have similar rules):

```
<xsd:complexType name="ReportedFinancialSummaryType">
  <xsd:sequence>
    <xsd:element name="FinancialAwardType" type="cod:FinancialAwards"/>
    <xsd:element name="FinancialAwardYear" type="xsd:gYear"/>
    <xsd:element name="TotalCount" type="cod:TotalCountType"/>
    <xsd:element name="TotalReportedAward" type="cod:LargeCurrencyType" minOccurs="0"/>
    <xsd:element name="TotalReportedDisbursement" type="cod:LargeCurrencyType" minOccurs="0"/>
  </xsd:sequence>
</xsd:complexType>
```

The intent of this Technical Reference is to describe the purpose and use of the COD Process and the Common Record. XML Standards are not presented here and should be obtained from other sources. The following is a representation of the Common Record content, for example, data elements, valid values and maximum field lengths. It does not represent the physical layout of the data transmission. The layout is depicted in a separate document, the XML schema.

Schema Version	Status	Schema Name
2.0e	Retired April 2014	NA
3.0a	Retired April 2014	NA
3.0b	Retired April 2014	NA
3.0c	Retired April 2014	NA
3.0d	Retired March 2022	N/A
3.0e	Retired March 2022	N/A
4.0a	Active	CommonRecord4.0a.xsd CommonRecord4.0a-VR.xsd
4.0b	Active	CommonRecord4.0b.xsd
4.0c	Active	CommonRecord4.0c.xsd
4.0d	Active	CommonRecord4.0d.xsd
4.0e	Active	CommonRecord4.0e.xsd
5.0a	Active	CommonRecord5.0a.xsd
5.0b	Active	CommonRecord5.0b.xsd
5.0c	Active	CommonRecord5.0c.xsd

Table 69

## SCHEMA VERSIONS WITH CURRENT STATUS

Beginning in March 2025, schools must use Version 5.0c of the Common Record XML schema for the 2025-26 Award Year and forward.

The Common Record Layout lists elements in block sequence. A general rule regarding sequence of data within blocks, and within complex elements: the start and end data tags and their context must be presented on the XML document within the block's tags or the complex element tags to which they belong. The sequence of the data within that block or element is dictated by the sequence of the data tags presented in the 'Block Sequence' column of this document and further shown in the XML schema. For example, if a complex element has ten simple elements within it, those ten elements must occur in the same sequence as listed numerically below according to their 'Block Sequence' and depicted in the XML schema. If there is any discrepancy between the information presented here and the information presented in the XML schema, the XML Schema should be considered as the correct source for the information.



## Full Schema Enforcement

In April 2014 COD began to perform full Common Record schema validation on all incoming Common Record batches. This full schema enforcement pertains to all valid schema versions as of April 2014. These valid schema versions include 4.0a, 4.0b, 4.0c, 4.0d, 4.0e, 5.0a, 5.0b, and 5.0c. In the past exceptions have been made to allow certain invalid XML schema files to pass into the COD system. This is no longer the case and batches that do not pass full schema validation will not be processed by the COD system.

All Common Record batches submitted to COD must follow exactly the Common Record XML schema outlined in one of the below documents. For example, if the batch specifies that it has been sent in the 5.0c schema version, then the file must follow the schema presented in the following XSD documents: CommonRecord5.0c.xsd.

## COD XML Schema files are posted on the Knowledge Center website at COD XML Schema | Library | Knowledge Center. Schema Version 5.0c Common Record Layout

The COD System upgraded to Schema version 5.0c for the 2025-26 Award Year and forward.

## SYSTEM-GENERATED RESPONSES

All System-generated responses sent by the COD System will be enhanced to use the COD Common Record XML Schema Version 5.0c for all award years.

## CHANGES TO RESPONSE BLOCK

The COD System will add a new complex element <CIP> to the response file in the Disbursement Block for all programs with schema 5.0c. This complex element tag will be valid for award years 2025-26 and forward.

## CHANGES TO TRANSMISSION DATA BLOCK

There are no changes to the Transmission Data Block for schema version 5.0c.

## CHANGES TO PELL BLOCK

The COD System will add new complex element <CIP> to the Disbursement block for Pell awards with schema version 5.0c. This tag will be optional tag and will be valid for award years 2025-26 and forward.

## CHANGES TO PERSON BLOCK

There are no changes to the Person Block for schema version 5.0c.

## CHANGES TO DL PLUS BLOCK

The COD System will add new complex element <CIP> to the Disbursement block for DL PLUS awards with schema version 5.0c. This tag will be optional tag and will be valid for award years 2025-26 and forward.

## CHANGES TO DL SUBSIDIZED BLOCK

The COD System will add new complex element <CIP> to the Disbursement block for DL SUBSIDIZED awards with schema version 5.0c. This tag will be optional tag and will be valid for award years 2025-26 and forward.

## CHANGES TO DL UNSUBSIDIZED BLOCK

The COD System will add new complex element <CIP> to the Disbursement block for DL UNSUBSIDIZED awards with schema version 5.0c. This tag will be optional tag and will be valid for award years 2025-26 and forward.

## CHANGES TO TEACH BLOCK

The COD System will add new complex element <CIP> to the Disbursement block for TEACH awards with schema version 5.0c. This tag will be optional tag and will be valid for award years 2025-26 and forward.

# Document Information

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
1	<CommonRecord xmlns="" ">  Common Record: The root element for the document.	NA	NA	No	NA	Complex Element with Attribute	1st element in document	<CommonRecord.xml ns="http://www.ed.gov/ FSA/COD/2024/v5.0c" xmlns:xsi="http://www. w3.org/2001/XMLSche ma- instance"xsi:schemaLo cation="http://www.ed. gov/FSA/COD/2024/v5 .0cCommonRecord5.0 c.xsd ">	The attribute: "xmlns", and its value: http://www.ed.gov/FSA/COD/2024/v5.0c, are together used to indicate the namespace of the elements in the XML document. The namespace convention of COD incorporates the schema version indicator. The version indicator is the "/v5.0c" component of the namespace. When schema updates are made, the version indicator must reflect the update (e.g., "/v5.0c"). This attribute and value are required on all transmissions.  The namespace must be used exactly as it is appears in the Valid Schema Values column.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
2	<TransmissionData>  TransmissionData: Nested immediately below the Common Record element, it contains the DocumentID, CreatedDate Time, Source, Destination, Software, and FullResponseCode	NA	NA	NA	NA	Complex Element	Within <CommonRecord> block, 1st element	NA	NA
3	<DocumentID>  Document ID: The Date and Time stamp with the Source Entity ID. This tag maps to the Pell Batch ID and the Direct Loan Origination Batch Identifier, the Disbursement Batch Number, and the Change Batch Identifier	30	30	No	String	Simple Element	Within <TransmissionData> block, 1st element	CCYY-MM-DDTHH:mm:ss.ff999999 9	Submitting a DocumentID that is already in the system will result in a 003 batch level reject. Once initial information is submitted to COD, new content cannot overwrite the database.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
4	<b>&lt;CreatedDateTime&gt;</b>  Created Date and Time: The Date and Time stamp when the document was created.	0	None	No	Date/Time	Simple Element	Within <TransmissionData> block, 2nd element	CCYY-MM-DDTHH:mm:ss.ff	For 2025-26 awards, the valid date range is from 2024-10-01 to present.  Submitting a CreatedDate Time that is in the future will result in a 006 batch level reject. Once initial information is submitted to COD, new content cannot overwrite the database.
5	<b>&lt;Source&gt;</b>  Source: This element provides a logical grouping of elements related to Document Information.	NA	NA	NA	NA	Complex Element	Within <TransmissionData> block, 3rd element	NA	Once initial information is submitted to COD, new content cannot overwrite the database.
6	<b>&lt;Destination&gt;</b>  Destination: This element provides a logical grouping of elements related to Document Information.	NA	NA	NA	NA	Complex Element	Within <TransmissionData> block, 4th element	NA	Once initial information is submitted to COD, new content cannot overwrite the database.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
7	<Lender> <Guarantor> <School> <ThirdParty Servicer> <COD> <Other>  Complex element containing the Routing ID simple element that identifies data exchange partner.	NA	NA	NA	NA	Complex Element	Within <Destination> block, 1st element  Within <Source> block, 1st element	NA	—
8	<RoutingID>  Routing ID: Element containing the unique identifier for each data exchange partner. This identifier is used by a translator to produce related identifiers (i.e., OPE ID, Direct Loan School Code, Reporting Pell ID, UEI, etc).	1	8	No	String	Simple Element	<Lendor> 1st element in block  <Guarantor> 1st element in block  <School> 1st element in block  <ThirdPartyServicer> 1st element in block  <COD> 1st element in block  <Other> 1st element in block  <ReportingSchool> 1st element in block  <AttendedSchool> 1st element in block	1 to 99999999	Must be a valid unique identifier for each data exchange partner.  COD will pad the Routing ID with leading 0's to reach 8 digits.  The Routing ID of COD is 00000001.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
9	<Software>  Software: This element provides a logical grouping of elements related to Entity Information.	NA	NA	NA	NA	Complex Element	Within <TransmissionData> block, 5th element	NA	—
10	<SoftwareProvider>  Software Provider: This element indicates the software provider and product.	0	10	No	String	Simple Element	Within <Software> block, 1st element	—	Software provider defined
11	<SoftwareVersion>  Software Version: This element indicates the software version number.	0	6	No	String	Simple Element	Within <Software> block, 2nd element	—	Software version defined
12	<OtherSoftwareProvider>  Other Software Provider: This element indicates the other software provider and product.	0	10	Yes	String	Simple Element	Within <Software> block, 3rd element	—	Other Software provider defined
13	<OtherSoftwareVersion>  Other Software Version: This element indicates the other software version number.	0	6	Yes	String	Simple Element	Within <Software> block, 4th element	—	Other Software version defined

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
14	<FullResponseCode>  Full Response Code: This element provides a code allowing an override on Entity profile concerning the response document.	1	1	No	String	Simple Element	Within <TransmissionData> block, 6th element	Enumerated list, value must be:  S, F, N, or M	Defaults to Standard Response if not included.  S, N, M = Standard Response  F = Full Response (standard plus original data)
15	<ReportingSchool> Reporting School Entity Identification: A complex element. This element provides a logical grouping of elements related to Entity Information.	NA	NA	NA	NA	Complex Element	Within <CommonRecord> block, 2nd element	99999999	Once initial information is submitted to COD, new content cannot overwrite the database.

Table 70: Document Information  
An em dash or “—” indicates no data.



## Entity Information

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
16	<ReportedFinancialSummary>  Reported Financial Summary: A complex element. This element provides a logical grouping of elements related to reported summary information.	NA	NA	NA	NA	Complex Element	<ReportingSchool> starting at 2, include an extra <ReportedFinancialSummary> block for each combination of Award Type and Year	NA	—
17	<FinancialAwardType>  Financial Award Type: This element indicates the award type. This tag is listed in the Reported Financial Summary and the Response Financial Summary complex elements.	NA	NA	No	String	Simple Element	<ReportedFinancialSummary> 1st element in block  <ResponseFinancialSummary> 1st element in block	Must be one of the following values (enumerated list):  Pell TEACH DLSubsidized DLUnsubsidized DLPLUS Counseling	Once initial information is submitted to COD, new content cannot overwrite the database.
18	<FinancialAwardYear>  Financial Award Year: This element indicates the year corresponding to awards. This tag is listed in the Reported Financial Summary and Response Financial Summary.	4	4	No	Year	Simple Element	<ReportedFinancialSummary> 2nd element in block  <ResponseFinancialSummary> 2nd element in block	CCYY	Last year in cycle is used (i.e., 2026 corresponds to 2025-2026) Year > 2016  Once initial information is submitted to COD, new content cannot overwrite the database.
19	<TotalCount>  Total Number of Awards: Total number of award tags in this document (can be duplicated). This information is	1	9	No	Integer	Simple Element	<ReportedFinancialSummary> 3rd element in block <ResponseFinancialSummary> 3rd element in block	0-999999999	Once initial information is submitted to COD, new content cannot overwrite the database.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	summarized by award type by award year. This tag is listed in the Reported Financial Summary and the Response Financial Summary complex elements.								
20	<b>&lt;TotalReportedAward&gt;</b>  Total Award Amount Reported: The total dollar value for awards reported in this document. This information is summarized by award type by award year. This tag is listed in Reported Financial Summary and the Response Financial Summary complex elements.	1	15	No	Decimal	Simple Element	<b>&lt;ReportedFinancialSummary&gt;</b> 4th element in block  <b>&lt;ResponseFinancialSummary&gt;</b> 10th element in block	0-999999999999.99	Once initial information is submitted to COD, new content cannot overwrite the database.
21	<b>&lt;TotalReportedDisbursement&gt;</b>  Total Disbursement Amount Reported: The total dollar value reported in this document. For Direct Loan, this is the total gross disbursement amount. This information is summarized by award type by award year. This tag is listed in the Reported Financial	1	15	No	Decimal	Simple Element	<b>&lt;ReportedFinancialSummary&gt;</b> 5th element in block  <b>&lt;ResponseFinancialSummary&gt;</b> 11th element in block	0-999999999999.99	Once initial information is submitted to COD, new content cannot overwrite the database.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	Summary and the Response Financial Summary complex elements.								
22	<AttendedSchool>  Attending School Entity Identification: A complex element. This element provides a logical grouping of elements related to Entity Information.	NA	NA	NA	NA	Complex Element	<ReportingSchool> starting after the last <ReportedFinancialSummary> block and continuing until all <AttendedSchool> blocks per <ReportingSchool> have been reported	99999999	Once initial information is submitted to COD, new content cannot overwrite the database.
23	<Student>  Student: A complex element that provides a logical grouping of elements related to the student or borrower.	NA	NA	NA	NA	Complex Element	Within <AttendedSchool> block, 1st element	NA	NA

Table 71: Entity Information

## Person Information

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
24	<b>&lt;Borrower&gt;</b>  Borrower: A complex element that provides a logical grouping of elements related to the borrower.	NA	NA	NA	NA	Complex Element	<DLPLUS> 20th element in block	NA	NA
25	<b>&lt;Endorser&gt;</b>  Endorser: A complex element that provides a logical grouping of elements related to the endorser.  Note: this tag is not currently in use.	NA	NA	NA	NA	Complex Element	DLPLUS <Response> 16th element in block	NA	NA
26	<b>&lt;Index&gt;</b>  Index: This element provides a logical grouping of elements related to indexing information, which includes the SSN, BirthDate and LastName elements.	NA	NA	NA	NA	Complex Element	<Student> 1st element in block  <Borrower> 1st element in block	NA	NA
27	<b>&lt;PersonIdentifiers&gt;</b>  Person Identifiers: This element provides a logical grouping of elements related to identification information.	NA	NA	NA	NA	Complex Element	<Student> 2nd element in block  <Borrower> 2nd element in block	NA	NA

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
28	<b>&lt;SSN&gt;</b>  Social Security Number: The person's current Social Security Number. This tag, in the PersonIdentifiers block, can be used to change the stored SSN. If the content of this tag is different when comparing the Index and PersonIdentifiers block then COD will update the stored value as the value in the PersonIdentifiers block.	7	9	No	String	Simple Element	<b>&lt;Index&gt;</b> 1st element in block  <b>&lt;PersonIdentifiers&gt;</b> 1st element in block	Must follow one of the following 3 patterns: XXXXXXXX XXXXXXXXX XXXXXXXXXXXX	Values ranging from 000010001 to 999999999  Values should not be submitted using dashes (-)
29	<b>&lt;DriversLicense&gt;</b>  Driver's License: This element provides a logical grouping of elements related to the Drivers License.	NA	NA	NA	NA	Complex Element	<b>&lt;PersonIdentifiers&gt;</b> 2nd element in block	NA	NA
30	<b>&lt;DriversLicenseState&gt;</b>  Driver's License State: Attribute indicating the person's Driver's License State.	2	2	No	String	Simple Element	<b>&lt;DriversLicense&gt;</b> 1st element in block	—	The valid business rule values are: AA, AB, AE, AK, AL, AP, AR, AS, AZ, BC, CA, CO, CT, CZ, DC, DE, FL, FM, GA, GU, HI, IA, ID IL, IN, KS, KY, LA, MA, MB, MD, ME, MH, MI, MN, MO, MP, MS, MT, NB, NC, ND, NE, NF, NH, NJ, NL, NM, NS, NT, NU, NV, NY, OH, OK, ON, OR, PA, PE, PR, PW, QC, RI, SC, SD, SK, TN, TX, UT, VA, VI, VT, WA, WI,

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									WV, WY, YT
31	<DriversLicenseNumber>  Driver's License Number: The person's Driver's License Number.	0	20	No	String	Simple Element	<DriversLicense> 2nd element in block	—	The valid business rule values are: 0 to 9; Uppercase A to Z; Space(s); *(Asterisk); -(Dash)
32	<SchoolAssignedPersonID>  School Assigned Person ID: This is an institutionally defined identification number for the student.	0	20	Yes	String	Simple Element	<PersonIdentifiers> 3rd element in block	—	Institutionally defined.
33	<Birth>  Birth: A complex element containing the BirthDate simple element.	NA	NA	NA	NA	Complex Element	<Student> 3rd element in block  <Borrower> 3rd element in block	NA	NA
34	<BirthDate>  Birth Date: The person's current Date of Birth. This tag, in the Birth block, can be used to change the stored Date of Birth. If the content of this tag is different when comparing the Index and Birth block then COD will update the stored value as the value in the Birth block.	10	10	No	Date	Simple Element	<Index> 2nd element in block  <Birth> 1st element in block	CCYY-MM- DD	1926-01-01 to 2017-12-31

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
35	<Name>  Name: This element provides a logical grouping of elements related to name information.	NA	NA	NA	NA	Complex Element	<Student> 4th element in block  <Borrower> 4th element in block	NA	NA
36	<FirstName>  First Name: The person's first name. This basic component specifies the name given to a person at birth, baptism, or another naming ceremony, or through legal change.	0	35	Yes	String	Simple Element	<Name> 1st element in block	—	The valid business rule values are: Letters (uppercase 'A- Z' and lowercase 'a- z'); Space(s); (period); '(apostrophe); -(dash); numeric values are not valid.
37	<MiddleName>  Middle Name: The person's middle name. This basic component specifies a person's middle name.	0	35	Yes	String	Simple Element	<Name> 2nd element in block	—	The valid business rule values are: Letters (uppercase 'A- Z' and lowercase 'a- z'); numeric values are not valid.
38	<LastName>  Last Name: The person's current Last Name. This tag, in the Name block, can be used to change the stored Last Name. If the content of this tag is different when comparing the Index and Name block then COD will update the stored value as the value in the Name block.	0	35	Yes	String	Simple Element	<Index> 3rd element in block  <Name> 3rd element in block	—	Letters (uppercase 'A- Z' and lowercase 'a- z'); Space(s); (period); '(apostrophe); -(dash); numeric values are not valid.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
39	<Suffix>  Suffix: The person's Suffix following their last name.	1	10	Yes	String	Simple Element	<Name> 4th element in block	—	Valid Values: Letters (uppercase 'A- Z' and lowercase 'a- z'); Space(s); Blank(s); . (period); - (hyphen); ' (apostrophe) Numbers (0-9)
40	<Contacts>  Contacts: This element provides a logical grouping of elements related to contact information.	NA	NA	NA	NA	Complex Element	<Student> 5th element in block.  <Borrower> 5th element in block	NA	—
41	<PermanentAddress>  Permanent Address: This element provides a logical grouping of elements related to Permanent Address information.	NA	NA	NA	NA	Complex Element	<Contacts> 1st element in block	NA	Note: This element is required for the Borrower on Direct PLUS Loan originations.
42	<TemporaryAddress>  Temporary Address: This element provides a logical grouping of elements related to Temporary Address information.	NA	NA	NA	NA	Complex Element	<Contacts> 2nd element in block	NA	—
43	<AddressLine>  Address Line: A line of the person's address. There is a maximum occurrence of three address lines for this	1	40	No	String	Simple Element	<PermanentAddress> 1st element in block  <TemporaryAddress> 1st element in block	Maximum of 3 appearances per block for this tag.	The valid business rule values are: 0 to 9; Letters (uppercase 'A-Z' and lowercase 'a-z'); . (Period); ' (Apostrophe);



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	<p>tag. The sequence of this tag maps to the person's first, second, and third lines of address.</p> <p>This basic component specifies the local delivery information such as street, building number, post office box, or apartment portion of a postal address.</p>								<p>-(Dash); ,(Comma); #(Number); @(At); %(Percent or care of); &amp;(Ampersand); /(Slash); Space(s)</p> <p>COD will strip characters other than the ones listed above.</p> <p>For accents, COD will attempt to remove an accent from the character first if that results in a valid character we will store it. If it results in a non-valid character, it will be removed.</p>
44	<p>&lt;City&gt;</p> <p>City: The person's city.</p>	2	30	No	String	Simple Element	<p>&lt;PermanentAddress&gt; 2nd element in block</p> <p>&lt;TemporaryAddress&gt; 2nd element in block</p>	—	<p>The valid business rule values are: Letters (uppercase 'A- Z' and lowercase 'a- z'); (Period); '(Apostrophe); -(Dash); ,(Comma); #(Number); @(At); %(Percent or care of); &amp;(Ampersand); /(Slash); Space(s) COD will strip characters other than the ones listed above.</p>

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									For accents, COD will attempt to remove an accent from the character first if that results in a valid character we will store it. If it results in a non-valid character, it will be removed.
45	<StateProvinceCode>  State/Province Code: The person's State or Province. This tag is required for a Domestic Address	2	2	No	String	Simple Element	<PermanentAddress> 3rd element in block for Domestic Addresses <TemporaryAddress> 3rd element in block for Domestic Addresses	This tag is only used for domestic addresses.	The valid business rule values are: AA, AB, AE, AK, AL, AP, AR, AS, AZ, BC, CA, CO, CT, CZ, DC, DE, FL, FM, GA, GU, HI, IA, ID IL, IN, KS, KY, LA, MA, MB, MD, ME, MH, MI, MN, MO, MP, MS, MT, NB, NC, ND, NE, NF, NH, NJ, NL, NM, NS, NT, NU, NV, NY, OH, OK, ON, OR, PA, PE, PR, PW, QC, RI, SC, SD, SK, TN, TX, UT, VA, VI, VT, WA, WI, WV, WY, YT
46	<PostalCode>  Postal Code: The person's Postal Code (Zip Code).	1	10	No	String	Simple Element	<PermanentAddress> 4th element in block for Domestic Addresses  <TemporaryAddress> 4th element in block for Domestic Addresses  <PermanentAddress> 4th element in block for	—	The valid business rule values are: 0 to 9; Uppercase A to Z. Spaces are permitted.  COD will strip characters other than the ones listed above.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
							International Addresses  <Temporary Address> 4th element in block for International Addresses		
47	<StateProvince>  State Province: The person's State Province	2	30	No	String	Simple Element	<PermanentAddress> 3rd element in block for International Addresses  <Temporary Address> 3rd element in block for International Addresses	Enumerated list provided within schema Value Range (VR) documentation.	—
48	<CountryCode>  Country Code: The person's country. This basic component specifies the ISO standard 3166-alpha 2 Country code for the address. This is required for an International Address.	2	2	No	String	Simple Element	<PermanentAddress> 5th element in block for International Addresses  <Temporary Address> 5th element in block for International Addresses	This tag is only used for foreign addresses.	The valid business rule values are: AF, AX, AL, DZ, AS, AD, AO, AI, AQ, AG, AR, AM, AW, AU, AT, AZ, BS, BH, BD, BB, BY, BE, BZ, BJ, BM, BT, BO, BA, BW, BV, BR, IO, BN, BG, BF, BI, KH, CM, CA, CV, KY, CF, TD, CL, CN, CX, CC, CO, KM, CG, CD, CK, CR, CI, HR, CU, CY, CZ, DK, DJ, DM, DO, EC, EG, SV, GQ, ER, EE, ET, FK, FO FJ, FI, FR, GF, PF, TF, GA, GM, GE, DE, GH, GI, GR, GL, GD, GP, GU, GT, GN, GW, GY, HT, HM, VA, HN, HK, HU,

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									IS, IN, ID, IR, IQ, IE, IL, IT, JM, JP, JO, KZ, KE, KI, KP, KR, KW, KG, LA, LV, LB, LS, LR, LY, LI, LT, LU, MO, MK, MG, MW, MY, MV, ML, MT, MH, MQ, MR, MU, YT, MX, FM, MD, MC, MN, MS, MA, MZ, MM, NA, NR, NP, NL, AN, NC, NZ, NI, NE, NG, NU, NF, MP, NO, OM, PK, PW, PS, PA, PG, PY, PE, PH, PN, PL, PT, PR, QA, RE, RO, RU, RS, RW, SH, KN, LC, PM, VC, WS, SM, ST, SA, SN, SC, SL, SG, SK, SI, SB, SO, ZA, GS, ES, LK, SD, SR, SJ, SZ, SE, CH, SY, TW, TJ, TZ, TH, TL, TG, TK, TO, TT, TN, TR, TM, TC, TV, UG, UA, AE, GB, US, UM, UY, UZ, VU, VE, VN, VG, VI, WF, EH, YE, ZM, ZW, GG, IM, JE, ME, BL, MF, BQ, CW, SS, SX, XK
49	<Phone>  Phone: This is a complex element that provides a logical grouping to information related to the phone number.	NA	NA	NA	NA	Complex Element	<Contacts> 3rd element in block	—	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
50	<PhoneNumber>  Phone Number: The person's phone number. There is a maximum occurrence of three phone numbers for this tag; however the COD System only stores the last occurrence of this tag.	7	15	Yes	String	Simple Element	<Phone> 1st element in block	Maximum of 3 appearances per block for this tag.	—
51	<Email>  Email: This is a complex element that provides a logical grouping to information related to the email address.	NA	NA	NA	NA	Complex Element	<Contacts> 4th element in block	NA	—
52	<EmailAddress>  Email Address: The person's email address. This basic component specifies the numbers, letters, and symbols used to identify an electronic mail (e-mail) user within the network to which the person or organization belongs. Follows the format of username@domain.	0	128	Yes	String	Simple Element	<Email> 1st element in block	—	The valid business rule values are: Any valid keyboard character including an underscore; but not the pipe symbol or space. If the field is not blank, an @ and a "." (period) to the right of the @ are required and a valid character must exist prior to the "." (period) and after the "." (period).
53	<Citizenship>  Citizenship: A complex element containing the CitizenshipStatusCode simple element	NA	NA	NA	NA	Complex Element	<Student> 6th element in block  <Borrower> 6th element in block	NA	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
54	<CitizenshipStatusCode>  Citizenship Status: The person's citizenship status. COD will pull student citizenship status from CPS for all award types except DL PLUS. For DL PLUS, there is an override field for student citizenship status to allow schools to report correction information from documentation located at the school. For DL PLUS for Parents: The Citizenship Status Code nested under the student tag indicates the status of the student. The Citizenship Status Code nested under the borrower tag indicates the status of the parent.	1	1	Yes	String	Simple Element	<Citizenship> 1st element in block	—	For all award programs, this value must be equal to either 1 or 2. Note: COD will pull this value from FPS for all award types.  This tag is required for borrower of a DLP award.  Value definitions for tag: 1 = U.S. Citizen (or U.S. national) 2 = Eligible noncitizen 3 = Not eligible
55	<Note>  Note: This complex element contains the School Note Message simple element	NA	NA	NA	NA	Complex Element	<Student> 7th element in block  <Borrower> 7th element in block  <DLSubsidized> 5th element in block  <DLUnsubsidized> 5th element in block	NA	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
							<DLPLUS> 5th element in block  <Pell> 5th element in block  <TEACH> 5th element in block  <Disbursement> 6th element in block		
56	<SchoolNoteMessage>  School Note Message: This tag contains cross-reference information useful to the School. This tag is located in the Person, Award, and Disbursement complex elements of the Common Record.	0	20	Yes	String	Simple Element	<Note> 1st element in block	—	Institutionally defined.

Table 72: Person Information  
 An em dash or “—” indicates no data.

## Award Information

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
57	<DLLoanInformationAwardKey = " " > Award Key: An attribute that is used as a reference key to identify related award information.	NA	NA	NA	NA	Complex Element	Within <Student>, 8th element in block	1-99	—
58	<OriginationFeePercent >  Origination Fee Percent: The origination fee percent used for this record.	1	7	Yes	Decimal	Simple Element	<DLLoanInformation> 1st element in block	Value must be between 0 - 100 Maximum 7 total characters including decimal  No more than 3 digits after the decimal	1 for 1 percent 1.068 for 1.068 percent 1.5 for 1.5 percent 2 for 2 percent 2.5 for 2.5 percent 3 for 3 percent 4 for 4 percent 4.272 for 4.272 percent
59	<InterestRebatePercent >  Interest Rebate Percent: The upfront interest rebate percentage for the disbursement.	1	7	Yes	Decimal	Simple Element	<DLLoanInformation> 2nd element in block	Value must be between 0 - 100 Maximum 7 total characters including decimal No more than 3 digits after the decimal	1.5 = 1.5percent 1 = 1.0 percent .5 = 0.5 percent
60	<PromissoryNotePrintCode>  Promissory Note Print Code: The Promissory Note print option used for this record.  Note: The COD System ignores the <PromissoryNotePrintCode>	1	1	Yes	String	Simple Element	<DLLoanInformation> 3rd element in block	Enumerated value list, value must be: S, R, Z, V, or O	Field is no longer processed by COD.



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
61	<DisclosureStatementPrintCode>  Disclosure Statement Print Code: Indicates whether the school or COD will print the Disclosure Statement. The party (school or COD) who is responsible for mailing the Disclosure Statement is also responsible for printing and mailing the Plain Language Disclosure Statement.	1	1	Yes	String	Simple Element	<DLLoanInformation> 4th element in block	—	Value definitions for tag: Y = COD prints and sends to Borrower R = COD reprint S = School prints
62	<StudentLevelCode>  Student Level Code: indicates the student's current academic level as defined by the Direct Loan or TEACH Programs.	1	1	Yes	String	Simple Element	<DLLoanInformation> 5th element in block	—	For PLUS loans made to parent borrowers, this value must be 0, 1, 2, 3, 4 or 5. For PLUS loans made to graduate/ professional students, this value must be 6 or 7. For Subsidized, grade levels 6 and 7 are not valid if Award Begin Date is on or after 7/1/12 Value definitions for tag: 0 = 1st year, undergraduate/n ever attended college; 1 = 1st year, undergraduate/a ttended college before; 2 = 2nd year undergraduate/sophomore; 3 = 3rd year

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									undergraduate/junior; 4 = 4th year undergraduate/senior; 5 = 5th year/other undergraduate; 6 = 1st year graduate/professional; 7 = Continuing graduate/professional or beyond
63	<FinancialAwardBeginDate>  Financial Award Begin Date: The date when classes begin for the specific period covered by aid.	10	10	Yes	Date	Simple Element	<DLLoanInformation> 6th element in block	CCYY-MM-DD	Cannot be prior to the student's academic year begin date  On or before 2026-06-30
64	<FinancialAwardEndDate>  Financial Award End Date: The date when classes end for the specific period covered by aid.	10	10	Yes	Date	Simple Element	<DLLoanInformation> 7th element in block	CCYY-MM-DD	Cannot be after the student's academic year end date 2025-07-01 or after
65	<AcademicYearBeginDate>  Academic Year Begin Date: The date the student's academic year starts at the school.	10	10	Yes	Date	Simple Element	<DLLoanInformation> 8th element in block	CCYY-MM-DD	On or before 2026-06-30  Academic Year must not be less than the minimum time allowed by regulations.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
66	<AcademicYearEndDate>  Academic Year End Date: The date the student's academic year ends at the school.	10	10	Yes	Date	Simple Element	<DLLoanInformation> 9th element in block	CCYY-MM-DD	2025-07-01 or after Academic Year must not be less than the minimum time allowed by regulations.
67	<PublishedPgmLengthYears>  Published Program Length Years: The published length (in years) of a program.	1	6	No	Decimal	Simple Element	<DLLoanInformation> 10th element in block  Note: These fields are not valid for Award Year 2017-2018 and forward.	Value must be 0-99.999  Maximum 6 total characters including decimal  No more than 3 digits after the decimal	Only one of the following tags may be submitted: - PublishedPgmLengthYears - PublishedPgmLengthMonths - PublishedPgmLengthWeeks Valid value must be greater than 0.
68	<PublishedPgmLengthMonths>  Published Program Length Months: The published length (in months) of a program.	1	6	No	Decimal	Simple Element	<DLLoanInformation> 11th element in block  Note: These fields are not valid for Award Year 2017-2018 and forward.	Value must be 0-99.999  Maximum 6 total characters including decimal  No more than 3 digits after the decimal	Only one of the following tags may be submitted: - PublishedPgmLengthYears - PublishedPgmLengthMonths - PublishedPgmLengthWeeks Valid value must be greater than 0.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
69	<PublishedPgmLengthWeeks>  Published Program Length Weeks: The published length (in weeks) of a program.	1	7	No	Decimal	Simple Element	<DLLoanInformation> 12th element in block Note: These fields are not valid for Award Year 2017-2018 and forward.	Value must be 0-999.999 Maximum 7 total characters including decimal  No more than 3 digits after the decimal	Only one of the following tags may be submitted: - PublishedPgmLengthYears - PublishedPgmLengthMonths - PublishedPgmLengthWeeks Valid value must be greater than 0.
70	<WeeksProgramsAcademicYear>  Weeks Programs Academic Year: Total number of weeks of instruction in the program's academic year (Title IV Academic Year).	1	7	No	Decimal	Simple Element	<DLLoanInformation> 13th element in block  Note: These fields are not valid for Award Year 2017-2018 and forward.	Value must be 0-999.999  Maximum 7 total characters including decimal  No more than 3 digits after the decimal	This tag shall be required upon submission if either PublishedPgmLengthMonths or PublishedPgmLengthWeeks is submitted. This tag is also required when the <SpecialPrograms> tag is set to 'P'.  Valid value must be greater than 0.
71	<SpecialPrograms>  Special Programs: Indicator of the special program type being covered by aid.	1	1	No	String	Simple Element	<DLLoanInformation> 14th element in block  Note: These fields are not valid for Award Year 2017-2018 and forward.	—	Values of SpecialPrograms are the following: A, B, N, P, T, or U Other COD Rules A: Selective Admission Associate Program B: Bachelor's Degree Completion Program N: Not Applicable P: Preparatory Coursework Graduate Professional Program

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									T: Non- Credential Teacher Certification Program U: Preparatory Coursework Undergraduate Program
72	<ProgramCredentialLevel>  Program Credential Level: The credential level of the program that is being covered by aid.	1	2	No	Integer	Simple Element	<DLLoanInformation> 15th element in block  Note: These fields are not valid for Award Year 2017-2018 and forward.	Value must be between 0-99	Values of ProgramCredentialLevel are the following: 1, 2, 3, 4, 5, 6, 7, 8, 99 1: Undergraduate certificate or diploma program 2: Associate's degree 3: Bachelor's degree 4: Post Baccalaureate certificate 5: Master's degree 6: Doctoral degree 7: First Professional degree 8: Graduate/professional certificate 99: Non-credential programs (preparatory coursework/teacher certification)
73	<Pell> <TEACH> <DLSubsidized> <DLUnsubsidized> <DLPLUS> <Counseling>  A complex element. This element provides a logical grouping of	NA	NA	NA	NA	Complex Element with Attribute	<Student> this block comes somewhere after the <Note> block in Student, for DL loans it should be preceded by a <DLLoanInformation AwardKey= " "> block	Required tag if award is to be reported in common record	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	elements related to award information.  * COD will accept the award type but will not process the record.								
74	<AwardKey>  Award Key: This tag references related award information.	1	2	No	Integer	Simple Element	<DLSubsidized> 1st element in block  <DLUnsubsidized> 1st element in block  <DLPLUS> 1st element in block  <Pell> 1st element in block  <TEACH> 1st element in block	Value must be between 1 - 99	—
75	<FinancialAwardYear>  Financial Award Year: Tag indicating the year corresponding to awards.	4	4	No	Year	Simple Element	<DLSubsidized> 2nd element in block  <DLUnsubsidized> 2nd element in block  <DLPLUS> 2nd element in block  <Pell> 2nd element in block  <TEACH> 2nd element in block	CCYY	List last year in cycle (i.e., 2025 for 2024-2025).

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
76	<FPSTransactionNumber>  FPS Transaction Number: Transaction number from eligible ISIR used to calculate award.	1	2	Yes	Integer	Simple Element	<DLSubsidized> 3rd element in block  <DLUnsubsidized> 3rd element in block  <DLPLUS> 3rd element in block  <Pell> 3rd element in block  <TEACH> 3rd element in block	Value must be between 1 - 99	—
77	<FinancialAwardAmount>  Financial Award Amount: The total award amount that the student is eligible to receive as determined by the school.	1	12	Yes	Decimal	Simple Element	<DLSubsidized> 4th element in block  <DLUnsubsidized> 4th element in block  <DLPLUS> 4th element in block  <Pell> 4th element in block  <TEACH> 4th element in block	Value must be between 0 - 999999999.99	<b>Subsidized/Unsubsidized:</b> Loan amount approved cannot be greater than the maximum annual loan limit amount.  <b>Pell:</b> Award Amount for Entire School Year. The student's maximum Financial Award Amount is 100% of their Scheduled Federal Pell Grant (SFPG), unless the AEI=true which would allow for 150% of the maximum SFPG.  <b>TEACH Grant:</b> Grade Levels 0-7: 4,000 Sub, Unsub– Refer to Performing Annual Loan Limit Edits topic in Volume 2, Section 1 –

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									Implementation Guide. <b>PLUS:</b> 999999.99
78	<DependencyStatusCode>  Dependency Status Code: This element describes the dependency status of the student.	1	1	Yes	String	Simple Element	<DLSubsidized> 6th element in block  <DLUnsubsidized> 6th element in block  <DLPLUS> 6th element in block	Enumerated value list, value must be:  I, or D	For PLUS loans made to parent borrowers, this value must be D. For PLUS loans made to graduate/professional students, this value must be I.  Note: Dependency Status Code is only required for Award Years 2008-2009 and forward. Value definitions for tag: I = Independent D = Dependent
79	<EntranceCounseling>  Entrance Counseling: This element indicates the type of counseling a borrower has completed.	NA	NA	Yes	Boolean	Simple Element	<DLSubsidized> 7th element in block  <DLUnsubsidized> 7th element in block  <DLPLUS> 7th element in block  <TEACH> 11th element in block DLSubsidized, DLUnsubsidized, DLPLUS  <Response> 13th element in block TEACH	Boolean, value must be:  true false	true = School indicates borrower completed entrance counseling at their institution. false = School indicates borrower has not completed entrance counseling at their institution.  Note: Will be returned when submitted in 3.0d (or higher) schema any AY.



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
							<Response> 17th element in block		
80	<DefaultOverpayCode>  Default Overpay Code: This element indicates the default/overaward information.  Note: This tag is required for a PLUS borrower but is optional for the student on a Parent PLUS award.  Note: As of July 2011, this field is also included in the PLUS Application Acknowledgement.	1	1	No	String	Simple Element	<DLSubsidized> 8th element in block  <DLUnsubsidized> 8th element in block  <DLPLUS> 8th element in block  <Borrower> 8th element in block	—	The Default Overpay Code nested under the student tag indicates the status of the student. The Default Overpay Code nested under the Borrower tag indicates the status of the parent. Value definitions for tag: Y = Yes N = No Z = Overridden by School E = Not Returned from NSLDS (PLUS Application only)
81	<FinancialAwardNumber>  Financial Award Number: Award identifier or Award Sequence Number (last three positions of the Financial Award ID).	1	3	No	Integer	Simple Element	<DLSubsidized> 9th element in block <DLUnsubsidized> 9th element in block  <DLPLUS> 9th element in block  <Pell> 6th element in block  <TEACH> 6th element in block	Value must be between 1 - 999	For Direct Loan Programs and TEACH: 1-999.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
82	<FinancialAwardID>  Financial Award ID: Unique award identifier.	0	21	No	String	Simple Element	<DLSubsidized> 10th element in block  <DLUnsubsidized> > 10th element in block  <DLPLUS> 10th element in block  <Pell> 7th element in block  <TEACH> 7th element in block	—	For <b>Direct Loan</b> : Student's Social Security Number: 000010001-999999998 Loan Type: S = Subsidized U = Unsubsidized P = PLUS for parent and graduate/professional borrowers Program Year: 25, for 2024-2025 School Code: X00000-X99999 where X = G or E Loan Sequence Number: 001-999  For <b>TEACH Grant</b> : Student's Social Security Number: 000010001-999999998 Award Type: H = TEACH Award Year: 24 for 2023-2024 First six digits of school OPEID: 000000-099990 Award Sequence Number: 001-999  Note: Valid values must be uppercase  Note: Max length is 21.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
83	<DirectLoanAttendance Cost>  Direct Loan Cost of Attendance: Direct Loan Cost of Attendance: The Direct Loan cost of attendance including and not limited to tuition and fees, room and board, books and supplies, transportation, insurance, and miscellaneous personal expenses.	1	9	Yes	Integer	Simple Element	<DLSubsidized> 11th element in Award Block  <DLUnsubsidized> > 11th element in Award Block  <DLPLUS> 11th element in Award Block	Value must be between 0 – 999999999	This field will be valid for award year 2022-2023 and forward.
84	<FinancialAwardCreateDate>  Financial Award Create Date: the date the school created the award record.	10	10	Yes	Date	Simple Element	<DLSubsidized> 12th element in block  <DLUnsubsidized> > 12th element in block  <DLPLUS> 12th element in block	CCYY-MM-DD	1900-01-01 to 2099-12-31  Note: Currently for the 2025-2026 AY this date must be on or after 10/1/2024 or records will be rejected.
85	<ProgramOfStudy>  Program of Study: This value is required for Foreign School users. This field will display the program of study attributed to the corresponding unduplicated origination and disbursement amounts. Domestic schools should not submit this tag.	0	3	Yes	String	Simple Element	<DLSubsidized> 13th element in block  <DLUnsubsidized> > 13th element in block  <DLPLUS> 13th element in block	—	Note: Not applicable for Award Year 2014-2015 and forward

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
86	<FinancialAwardAmountRequested>  Financial Award Amount Requested: The total award amount that the parent is interested in borrowing for the PLUS loan.	1	12	Yes	Decimal	Simple Element	<DLPLUS> 19th element in block	Value must be between 0 - 999999999.99	—
87	<HPPAIndicator>  Health Professions flag: Indicates if the student is eligible for a Health Profession Programs additional unsubsidized loan amount. This was formerly a HEAL loan.	NA	NA	Yes	Boolean	Simple Element	<DLUnsubsidized> 19th element in block	Boolean, value must be: true, or false	Note: The COD System will not allow Foreign Schools to process the HPPA Flag on Direct Loan Unsubsidized awards. This is an exception only applying to Foreign Schools. This tag is optional. If the tag is not sent, the default is false. Value definitions for tag: true = Student is eligible for an additional loan amount. false = Student is not eligible for an additional loan amount.
88	<AttendanceCost>  Attendance Cost: The cost of attending school. For Pell, the amount must equal COA calculated by the School for a full-time student or a full academic year following the Federal Pell Grant Program requirements.	1	12	Yes	Decimal	Simple Element	<Pell> 8th element in block	Value must be between 0 – 999999999.99	The valid business rule values are: Value must be between 0 – 999999.99

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
89	<IncarceratedIndicator>  Incarcerated Indicator: Indicator identifying if the student is incarcerated in local penal institution but otherwise eligible to receive Federal Pell Grants.	NA	NA	Yes	Boolean	Simple Element	<Pell> 10th element in block	Boolean, value must be: true, or false	If the student has never been incarcerated, do not submit the tag to COD.  Value definitions for tag: true = Yes, the student is incarcerated in a local institution but is otherwise eligible. false = No, the student was previously reported as incarcerated, but is not or is no longer incarcerated.  Valid for 2021- 22 award year and prior.
90	<VerificationStatusCode>  Verification Status Code: Verification status of the applicant as reported by the school.	1	1	Yes	String	Simple Element	<DLSubsidized> 19th element in block  Note: <DLSubsidized> 19th element in block is for future use  <Pell> 11th element in block	—	Value definitions for tag: W = Without Documentation V = Verified S = Selected but not verified
91	<EnrollmentDate>  Enrollment Date: First date that the student was enrolled in an eligible program for the designated award year. If the student enrolled in a crossover payment period before the first	10	10	Yes	Date	Simple Element	<Pell> 12th element in block  <> <TEACH> 9th element in block	CCYY-MM-DD	2024-10-01 to 2026-06-30.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	day of the Pell award year (July 1), but which will be paid from 2024-2025 funds, report the actual start date of the student's classes for that payment period.								
92	<p>&lt;AdditionalUnsubsidizedEligibilityIndicator&gt;</p> <p>Additional Unsubsidized Indicator: Indicates whether a dependent undergraduate student is receiving an additional, unsubsidized amount. If a dependent undergraduate student is not receiving an additional, unsubsidized amount, the sum of all subsidized and unsubsidized awards for that academic year cannot exceed the Base Annual Loan Limit.</p>	NA	NA	Yes	Boolean	Simple Element	<DLUnsubsidized> 20th element in block	Boolean, value must be: true, or false	<p>Note: Edits triggered on this field will return AdditionalUnsubsidizedEligibility as the error value within the ResponseErrorField tag.</p> <p>Note: If student is independent, the value must be false.</p> <p>Value definitions for tag: true = dependent, undergraduate student is receiving an additional unsubsidized amount false = student is not receiving an additional unsubsidized amount OR the student is independent and, therefore, is automatically eligible for the additional amount.</p>
93	<p>&lt;PreprofessionalCourseworkIndicator&gt;</p> <p>Preprofessional Coursework Indicator: Indicates if the student is eligible for Preprofessional Coursework additional</p>	NA	NA	Yes	Boolean	Simple Element	<DLUnsubsidized> 21st element in block	Boolean, value must be: true, or false	<p>This tag is optional. If the tag is not sent, the default is false.</p> <p>Value definitions for tag: true = Student is eligible for an additional loan amount for award first disbursed on or after</p>

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	unsubsidized loan amount due to enrollment in preparatory coursework for a graduate/professional program or enrollment in a teacher certification program beyond their baccalaureate degree.								<p>July 1, 2007.</p> <p>Unsubsidized only.</p> <p>false = Student is not eligible for an additional loan amount.</p> <p>Unsubsidized only.</p>
94	<p>&lt;TeacherExpertIndicator&gt;</p> <p>Teacher Expert Indicator: Indicates that the graduate student is a teacher expert. This tag may only be submitted for graduate students (grade level equals either 6 or 7)</p>	NA	NA	Yes	Boolean	Simple Element	<TEACH> 10th element in block	Boolean, value must be: true, or false	<p>Note: true is a valid value if and only if the grade level is equal to either 6 or 7.</p> <p>Value definitions for tag: true = Student is a graduate student AND a teacher expert. false = Student is not a graduate student OR not a teacher expert.</p>
95	<p>&lt;ApplicationID&gt;</p> <p>Application ID: This value indicates the unique application identifier that is used in PLUS Applications</p>	1	10	No	Integer	Simple Element	<DLPLUS> 20th element in block	Value must be equal to or less than 9999999999	—
96	<p>&lt;StudentEligibilityCode&gt;</p> <p>Student Eligibility Code: This value indicates the student's Ability to Benefit or High School completion or equivalent</p>	0	2	Yes	String	Simple Element	<p>&lt;DLSubsidized&gt; 14th element in block</p> <p>&lt;DLUnsubsidized&gt; 14th element in block</p> <p>&lt;DLPLUS&gt; 14th element in</p>	—	<p>01 = ATB-Test Completed-1st Enrolled Before 7/1/12</p> <p>02 = ATB- College Credits- 1st Enrolled Before 7/1/12</p> <p>03 = State Process</p> <p>04 = Home Schooled</p> <p>06 = High School Diploma</p>

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
							block  <PELL> 16th element in block  <TEACH> 13th element in block		07 = GED or State Auth. H.S. Equivalent Certificate 09 = Academic Transcript of 2- yr Program Acceptable for Full Credit Transfer to a BA Program 10 = Program Leads to at least an Assoc. Degree, Excelled in H.S. and met the Admissions Requirements 11 = ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15 12 = ATB-Test Completed- 1st Enrolled 7/1/12 or After 13 = ATB-College Credits- 1st Enrolled 7/1/12 to 6/30/15 14 = ATB-College Credits- 1st Enrolled 7/1/12 or After 15 = Comprehensive Transition and Postsecondary (CTP) program  Note: The '02' value should only be submitted for students who qualify for Title IV aid under the alternate ATB provisions and not for any student meeting the standard eligibility provision. It should not be used for graduate



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									<p>students.</p> <p>Note: For graduate or professional programs where a high school diploma or its equivalent is not necessary for admission to the program, and the student has a bachelor's degree, submit '09'.</p> <p>Note: The following SEC values are retired for award year 2023-2024 and forward: 11, 13.</p> <p>Note: SEC Code '03' will be reinstated for the award year 2023-2024 and forward for eligible states.</p>
97	<p>&lt;AbilityToBenefitTestAdministratorCode&gt;</p> <p>Ability To Benefit Test Administrator Code: Indicates the administrator code of the Ability to Benefit testing</p>	0	2	Yes	String	Simple Element	<p>&lt;DLSubsidized&gt; 15th element in block</p> <p>&lt;DLUnsubsidized&gt; 15th element in block</p> <p>&lt;DLPLUS&gt; 15th element in block</p> <p>&lt;Pell&gt; 17th element in block</p> <p>&lt;TEACH&gt; 14th element in block</p>	—	<p>01 = Testing Center 02 = Test Administrator</p> <p>Note: This tag is only used if the Student Eligibility Code = 01, 11, 12</p>

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
98	<AbilityToBenefitTestCode>  Ability To Benefit Test Code: Indicates which Ability to Benefit Test was taken by the students	0	2	Yes	String	Simple Element	<DLSubsidized> 16th element in block  <DLUnsubsidized> 16th element in block  <DLPLUS> 16th element in block  <Pell> 18th element in block  <TEACH> 15th element in block	—	01 = ASSET Program: Basic Skills Tests 02 = Career Programs Assessment (CPAT) Basic Skills Subtests 03 = Combined English Language Skills Assessment (CELSA) 04 = Compass Subtests (COMPASS) 05 = Computerized Placement Tests (CPTs)/ACCUP LACER 06 = Descriptive Tests: Language Skills and Mathematical Skills 07 = ESL Placement Test (COMPASS/ES L) 08 = Wonderlic Basic Skills Test (WBST) 09 = WorkKeys Program 10 = Test of Adult Basic Education (TABE) 11=Spanish Assessment of Basic Education (SABE) 12 = Wonderlic Basic Skills Test – Spanish 13 = Texas Success Initiative (TSI) Assessment  Note: This tag is only used if the Student Eligibility Code = 01, 11, 12
99	<AbilityToBenefitStateCode>	2	2	Yes	String	Simple Element	<DLSubsidized> 17th element in block	—	Note: This data element is only valid for the 2023-2024 Award Year

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	Ability To Benefit State Code: The state in which the student completed the State Process to achieve Ability To Benefit						<DLUnsubsidized> 17th element in block  <DLPLUS> 17th element in block  <Pell> 19th element in block  <TEACH> 16th element in block		and forward when the Student Eligibility Code submitted is 03- State Process.  Value definitions for tag: IL, WI, MS, WA, MN, IA, CA
100	<AbilityToBenefitCompletionDate>  Ability To Benefit Completion Date: Indicates the date that the student completed the Ability to Benefit Test or State Process	10	10	Yes	Date	Simple Element	<DLSubsidized> 18th element in block  <DLUnsubsidized> 18th element in block  <DLPLUS> 18th element in block  <Pell> 20th element in block  <TEACH> 17th element in block	CCYY-MM-DD	Note: This tag is only used if the Student Eligibility Code = 01, 03, 11, 12
101	<LessThanFullTimeIndicator>  Less Than Full Time Indicator: Flag indicating if student is less than full-time.	NA	NA	Yes	Boolean	Simple Element	—	Boolean, value must be: true false	Note: Not currently in use

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
104	<LowTuitionFeesCode>  Low Tuition and Fees Code: Indicator identifying tuition ranges when the annual tuition is less than or equal to minimum defined by low tuition and fees table.	1	1	Yes	String	Simple Element	<Pell> 9th element in block	Enumerated value list, value must be:  1, 2, 3, 4, or space	Note: Not applicable for Award Year 2008-2009 and forward.
105	<SecondaryEFCCode>  Secondary EFC Used Code: Indicator of EFC value used to determine award amount.	1	1	Yes	String	Simple Element	<Pell> 13th element in block	Enumerated value list, value must be:  O, or S	Note: Not applicable for Award Year 2005-2006 and forward.
108	<AdditionalEligibilityIndicator>  Additional Eligibility Indicator: Indicates whether a student is receiving an additional Pell grant.	NA	NA	No	Boolean	Simple Element	<Pell> 13th element in block	Boolean, value must be:  true, or false	Note: This field is only valid for Award Years 2017-2018 and forward Value definitions for tag: true = Student is eligible for 150% SFPG across all schools for the award year. false = Student is eligible for 100% SFPG across all schools for the award year.
109	<CounselingType>  Counseling Type: This element indicates the type of counseling corresponding to the award.	0	None	No	String	Simple Element	<Counseling> 2nd element in block	—	Tag is only valid in <Counseling> block DLSEntranceCounseling = Sub/Unsub DLPEntranceCounseling = Sub/Unsub PLUSTEACHCounseling = TEACH Grant Initial and Subsequent Counseling StudentLoanCounseling = Financial Awareness Counseling

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									ExitCounseling = Direct Loan and FFEL TEACHExit = TEACH Grant Exit Counseling
110	<CounselingSequenceNumber>  Counseling Sequence Number: This element indicates the sequence number for the counseling corresponding to the award.	1	3	No	Integer	Simple Element	<Counseling> 3rd element in block	Value must be between 1 - 999	Tag is only valid in <Counseling> block
111	<CounselingCompleteDate>  Counseling Complete Date: This element indicates the date counseling was completed.	10	10	No	Date	Simple Element	<Counseling> 4th element in block	CCYY-MM-DD	Tag is only valid in <Counseling> block
112	<BorrowerType>  Borrower Type: This element indicates the type of borrower.	NA	NA	Yes	String	Simple Element	<DLPLUS> 20st element in block	—	Note: This tag is reserved for future use.

Table 72: Award Information  
An em dash or “—” indicates no data.

## Disbursement Information

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
113	<DisbursementNumber=" "> Disbursement Number: Number of the disbursement.	NA	NA	NA	NA	Complex Element	<DLSubsidized> 19th element in block  <DLUnsubsidized> 19th element in block  <DLPLUS> 19th element in block  <Pell> 27th element in block  <TEACH> 18th element in block	NA	NA
114	<DisbursementAmount>  Disbursement Amount: The amount of money credited to the student's account at the school or paid to the student (or borrower if PLUS) directly. For Direct Loan, this is the gross disbursement amount before the fee and interest rebate calculations are made. If the DisbursementReleaseIndicator = false, this is anticipated disbursement information; if the	1	12	Yes	Decimal	Simple Element	All <DisbursementNumber=" "> 1st element in block	Value must be between 0 - 999999999.99	Value cannot be negative. <b>Pell:</b> Award Amount for Entire School Year. The student's maximum Disbursement Amount is 100% of their SFPG, unless the AEI =true which would allow for 150% of the maximum SFPG.  <b>TEACH Grant</b> Grade levels 0-7: 4,000  <b>Subsidized/Unsubsidized</b> – Refer to Performing Annual Loan Limit Edits topic in Volume 2, Section 1 –

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	DisbursementReleaseIndicator = true, then this is actual disbursement information. This tag maps to the Pell Disbursement Amount, Accepted Disbursement Amount.								Implementation Guide.  <b>PLUS:</b> 999999.99.
115	<DisbursementDate>  Disbursement Date: The date money was credited to the student's account at the school or paid to the student (or borrower if a PLUS loan) directly. If the DisbursementReleaseIndicator = false, this is anticipated disbursement information. If the DisbursementReleaseIndicator = true, then this is actual disbursement information.	10	10	Yes	Date	Simple Element	All <DisbursementNumber= " "> 2nd element in block	CCYY-MM-DD	For <b>Pell Grant</b> The date the 2025- 26 Maximum and Minimum Pell Amounts are published TBA to 09-30-2031  For <b>TEACH Grant</b> :>=2025-01-01.  For <b>Direct Loan:</b> <b>Sub/UnSub/PLUS/Grad PLUS:</b> 2024-10-01 to 2029- 12-28
116	<DisbursementReleaseIndicator>  Disbursement Release Indicator: The indicator identifying if the Entity is submitting an actual disbursement used to substantiate cash that has been drawn down or may lead to change in the CFL.	NA	NA	Yes	Boolean	Simple Element	All<DisbursementNumber= " "> 3rd element in block	Boolean, value must be: true, or false	Defaults to false for Pell Grant, TEACH Grant, and Direct Loan. Value definitions for tag: true = submit actual records for payment. false = submit anticipated records.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
117	<DisbursementSequenceNumber>  Disbursement Sequence Number: The number that determines the order in which transactions must be processed for a given disbursement number.	1	2	Yes	Integer	Simple Element	All <DisbursementNumber=" "> 4th element in block	Value must be between 1 -99	Disbursement sequence numbers must be incremented sequentially. Pell and TEACH Grant valid values are: 1-65 School assigned 66-90 COD assigned 99 – 91 Debt Collection Services transactions (COD assigned)  Direct Loan valid values are: 1-65 School assigned 66-90 COD assigned 99-91 Payment to Servicer (COD assigned in reverse order).
118	<EnrollmentSchoolCode> Enrollment School Code: Indicates the physical location where the student is attending class	8	8	No	String	Simple Element	All <DisbursementNumber=" "> 5th element in block	—	00000001-99999999  Note: Must be valid 8-digit OPE ID



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
119	<PaymentPeriodStartDate>  Payment Period Start Date: Beginning date of the Payment Period. Used to pay on awards submitted by schools that have become ineligible.	10	10	Yes	Date	Simple Element	All <Disbursement Number= " "> 6th element in block	CCYY-MM-DD	Valid date range for <b>Pell</b> : 2024-10-01 to 2026- 06-30 Valid date for DL must be within the loan period or equal to the loan period start date.  Valid date range for <b>TEACH</b> : 2024-10-01 to 2026-06-30  Note: Required for DL programs 2014-2015 and forward. Required for PL, IASG and TH programs 2022-2023 and forward. For Pell, IASG and TEACH this field is required if the school has become ineligible for award years 2021-2022 and prior. IASG has been retired for the 2024-25 Award Year and forward.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
120	<PaymentPeriodEndDate>  Payment Period End Date: End date of the Payment Period.	10	10	Yes	Date	Simple Element	All <Disbursement Number= " "> 7th element in block	CCYY-MM-DD	Valid date range for Pell and IASG is equal to the Pell disbursement date range. Valid date for DL must be within the loan period or equal to the loan period end date. Valid date range for TEACH is equal to the TEACH disbursement date range.  Note: Required for All programs for award years 2022- 2023 and forward. IASG has been retired for the 2024- 25 Award Year and forward.
121	<EnrollmentStatus>  Enrollment Status: For Direct Loans, the student's enrollment status as of the date that the disbursement is made for a payment period. If the disbursement is made after the end of the loan period or after the student drops below half-time enrollment, it is the enrollment status for the period for which the disbursement is being made. For Pell and IASG the enrollment status for the period for which the	1	1	No	String	Simple Element	All <Disbursement Number= " "> 8th element in block	—	Value definitions for tag: F = Full-time enrollment Q = Three-quarters- time enrollment H = Half-time enrollment L = Less-than-half- time enrollment (not valid for DL)  Ignored by COD for Pell for Award Year 2014- 2015 through 2016-2017.  Note: IASG has been retired for the 2024-25 Award Year and forward.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	disbursement is being made. Used to calculate subsidy usage periods and remaining subsidy eligibility.								
122	<EnrollmentIntensity>  The Enrollment Intensity Percentage of the disbursement.	1	3	No	Integer	Simple Element	<Pell> 9th element in Disbursement Block	—	Value must be a whole number between 0 – 100
123	<CIPNumber = ""> CIP Number: Number of the CIP code.	N/A	N/A	N/A	N/A	Complex Element	All <Disbursement Number= ""> 10th element in block	NA	A maximum of 3 occurrences
124	<ProgramCIPCode>  ProgramCIPCode: Description of student CIP Code (major).	0	20	No	String	Simple Element	All <CIPNumber= ""> 1st element in block	Maximum of 3 appearances per block for this tag. Must follow the following pattern: XX.XXXX	A list of valid values can be found at this link:  <a href="https://nces.ed.gov/ipeds/cipcode/default.aspx?y=56">https://nces.ed.gov/ipeds/cipcode/default.aspx?y=56</a> Ignored by COD for Pell for Award Years 2016-2017 and prior.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
125	<PublishedPgmLengthYears>  Published Program Length Years: The published length (in years) of a program.	1	6	No	Decimal	Simple Element	All <CIPNumber= "> 2nd element in block Not applicable for Award Years 2016-2017 and prior.	Value must be 0-99.999  Maximum 6 total characters including decimal  No more than 3 digits after the decimal	Only one of the following tags may be submitted: - PublishedPgmLengthYears - PublishedPgmLengthMonths - PublishedPgmLengthWeeks Valid value must be greater than 0. Must be submitted within the CIP complex element for Award Year 2025-26 and forward.
126	<PublishedPgmLengthMonths>  Published Program Length Months: The published length (in months) of a program	1	6	No	Decimal	Simple Element	All <CIPNumber= "> 3rd element in block  Not applicable for Award Years 2016-2017 and prior.	Value must be 0-99.999 Maximum 6 total characters including decimal  No more than 3 digits after the decimal	Only one of the following tags may be submitted: - PublishedPgmLengthYears - PublishedPgmLengthMonths - PublishedPgmLengthWeeks Valid value must be greater than 0.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
127	<p>&lt;PublishedPgmLengthWeeks&gt;</p> <p>Published Program Length Weeks: The published length (in weeks) of a program.</p>	1	7	No	Decimal	Simple Element	<p>All &lt;CIPNumber= "&gt; 4<sup>th</sup> element in block</p> <p>Not applicable for Award Years 2016-2017 and prior.</p>	<p>Value must be 0-999.999</p> <p>Maximum 7 total characters including decimal</p> <p>No more than 3 digits after the decimal</p>	<p>Only one of the following tags may be submitted:</p> <ul style="list-style-type: none"> <li>- PublishedPgmLengthYears</li> <li>- PublishedPgmLengthMonths</li> <li>- PublishedPgmLengthWeeks</li> </ul> <p>Valid value must be greater than 0. Must be submitted within the CIP complex element for Award Year 2025-26 and forward.</p>
128	<p>&lt;WeeksProgramsAcademicYear&gt;</p> <p>Weeks Programs Academic Year: Total number of weeks of instruction in the program's academic year (Title IV Academic Year).</p>	1	7	No	Decimal	Simple Element	<p>All &lt;CIPNumber= "&gt; 5<sup>th</sup> element in block</p> <p>Not applicable for Award Years 2016-2017 and prior.</p>	<p>Value must be 0-999.999</p> <p>Maximum 7 total characters including decimal</p> <p>No more than 3 digits after the decimal</p>	<p>This tag shall be required upon submission if either PublishedPgmLengthMonths or PublishedPgmLengthWeeks is submitted. This tag is also required when the &lt;SpecialPrograms&gt; tag is set to 'P'.</p> <p>Valid value must be greater than 0. Must be submitted within the CIP complex element for Award Year 2025-26 and forward.</p>

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
129	<SpecialPrograms>  Special Programs: Indicator of the special program type being covered by aid.	1	1	No	String	Simple Element	All <CIPNumber= "> 6th element in block  Not applicable for Award Years 2016-2017 and prior.	Values of Special Programs are the following: A, B, N, P, T, or U	A: Selective Admission Associate Program B: Bachelor's Degree Completion Program N: Not Applicable P: Preparatory Coursework Graduate Professional Program T: Non-Credential Teacher Certification Program U: Preparatory Coursework  Undergraduate Program Must be submitted within the CIP complex element for Award Year 2025-26 and forward.
130	<ProgramCredentialLevel>  ProgramCredential Level: The credential level of the program that is being covered by aid.	1	6	No	Integer	Simple Element	All <CIPNumber= "> 7th element in block  Not applicable for Award Years 2016-2017 and prior.	Value must be between 0-99.999 Maximum 6 total characters including decimal  No more than 3 digits after the decimal	1: Undergraduate certificate or diploma program 2: Associate's degree 3: Bachelor's degree 4: Post Baccalaureate certificate 5: Master's degree 6: Doctoral degree 7: First Professional degree 8: Graduate/professional certificate 99: Non-credential programs (preparatory coursework/teacher certification)

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
131	<ProgramCIPCodeYear>	4	4	No	Year	Simple Element	All <DisbursementNumber=" "> 11th element in block	CCYY	Value is 2020 for 2020-21 and forward. Any value submitted prior to 2020-2021 will be ignored. It is required for all programs.
132	<ProgramAttendanceBeginDate>	10	10	No	Date	Simple Element	All <DisbursementNumber=" "> 12th element in block	CCYY-MM-DD	Reserved for future use.
133	<EnrollmentStatusEffectiveDate>	10	10	No	Date	Simple Element	All <DisbursementNumber=" "> 13th element in block	CCYY-MM-DD	Reserved for future use.
134	<Note>	0	20	Yes	String	Simple Element	All <DisbursementNumber=" "> 14th element in block		Institutionally defined.
135	<IncarceratedStudentIndicator>  Student Incarcerated Indicator that is used to identify if the student is incarcerated but otherwise eligible to receive Federal Pell and IASG Grants.	NA	NA	Yes	Boolean	Simple Element	<Pell> 15th element in Disbursement Block	Boolean, value must be true or false	Note: This field will only be used for the 2022-2023 award year and forward. IASG has been retired for the 2024- 25 Award Year and forward.
136	<FirstDisbursementIndicator>  First Disbursement Flag: Flag identifying the disbursement with the earliest disbursement date.	NA	NA	Yes	Boolean	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <DisbursementNumber=" "> 16th element in block	Boolean, value must be: true, or false	Note: Currently not in use.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
137	<p>&lt;DisbursementNetAmount&gt;</p> <p>Disbursement Net Amount: The net award amount.</p> <p>For Direct Loan: The amount of money credited to the student's account (or borrower, if PLUS) at the school or paid to the student (or borrower, if PLUS) directly less fees plus rebate.</p> <p>If the DisbursementReleaseIndicator = false, this is anticipated disbursement information. If the DisbursementReleaseIndicator = true, then this is actual disbursement information.</p>	1	12	Yes	Decimal	Simple Element	<p>DLSubsidized, DLUnsubsidized, DLPLUS</p> <p>&lt;DisbursementNumber= "&gt; 17th element in block</p>	Value must be between 0 - 999999999.99	—
138	<p>&lt;DisbursementFeeAmount&gt;</p> <p>Disbursement Fee Amount: The Fee Amount.</p>	1	12	Yes	Decimal	Simple Element	<p>DLSubsidized, DLUnsubsidized, DLPLUS</p> <p>&lt;DisbursementNumber= "&gt; 18th element in block</p>	Value must be between 0 - 999999999.99	—



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
139	<InterestRebateAmount>  Interest Rebate Amount: The Upfront Interest Rebate Amount. If the DisbursementReleaseIndicator = false, this is anticipated disbursement information. If the DisbursementReleaseIndicator = true, then this is actual disbursement information.	1	12	Yes	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <DisbursementNumber= " "> 19 <sup>th</sup> element in block	Value must be between 0 - 999999999.99	—
140	<DisbursementConfirmationIndicator>  Disbursement Confirmation Indicator: Indication that the borrower at the school has confirmed this disbursement.	NA	NA	Yes	Boolean	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <DisbursementNumber= " "> 20 <sup>th</sup> element in block	Boolean, value must be: true, or false	Note: Currently not in use.  Value definitions for tag: true = Yes, this disbursement has been confirmed by the borrower. false = No, this disbursement has not been confirmed by the borrower.

Table 73: Disbursement Information  
An em dash or “—” indicates no data.

## Response Information

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
141	<Response>  Response: A complex element. This element provides a logical grouping of elements related to Entity Information.	NA	NA	No	NA	Complex Element	—	NA	NA
142	<ResponseCode>  Response Indicator: The result of processing the record on COD.	1	1	No	String	Simple Element	<Response> 1st element in block	Enumerated value list, value must be: A, R, D, or C	Value definitions for tag: A = Accepted R = Rejected D = Duplicate (Not in use) C = Corrected
143	<SubsidizedUsageLimitApplies>  Subsidized Usage Limit Applies: Flag indicating whether or not a person is subject to a subsidy limit for a Direct Subsidized Loan	NA	NA	No	Boolean	Simple Element	Student <Response> 3rd element in block	Boolean, value must be: true, or false	Value definitions for tag: true = subsidized usage limit applies false = subsidized usage limit does not apply  Only applicable for DLSubsidized awards.
144	<SumActualSubUsagePeriods>  Sum Actual Subsidized Usage Periods: The sum of all actual subsidized usage periods, excluding those for Non-Credential Teacher Certification Programs, for the student.	1	5	No	Decimal	Simple Element	Student <Response> 4th element in block	Value must be between 0-999.9 Maximum 5 total characters including decimal No more than 1 digit after the decimal	Only applicable for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
145	<p>&lt;SumActualNonCredTeacherCertSubUsagePeriods&gt;</p> <p>Sum Actual Non-Credential Teacher Certification Program Subsidized Usage Periods: The sum of all actual subsidized usage periods for a student that are for Non-Credential Teacher Certification Programs. It is summed across award years and schools.</p>	1	5	No	Decimal	Simple Element	Student <Response> 5th element in block	<p>Value must be between 0-999.9 Maximum 5 total characters including decimal</p> <p>No more than 1 digit after the decimal</p>	Only applicable for DLSubsidized awards.
146	<p>&lt;EMPNIIndicator&gt;</p> <p>Electronic MPN Indicator: This tag indicates whether there is an electronic or paper MPN.</p>	1	7	No	Boolean	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 3rd element in block	<p>Boolean, value must be:</p> <p>true, or false</p>	Value definitions for tag: true = Electronic MPN false = Paper MPN
147	<p>&lt;MPNID&gt;</p> <p>MPN ID: The MPN identifier printed on the MPN.</p>	0	23	No	String	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 4th element in block	—	<p>Student's Social Security Number: 000010001- 999999998</p> <p>MPN Type: M = Subsidized and Unsubsidized N = PLUS for parent and graduate/professional student borrowers</p> <p>Program Year: 26, for 2025-26</p> <p>School Code: X00000-X99999 where X = G or E</p> <p>MPN Sequence Number:</p>

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									999 – 001 (decrementing format; for EMPN only)
148	<MPNStatusCode> MPN Status Code: The status of the MPN on file at COD.	1	1	No	String	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 5th element in block	—	Value definitions for tag: A = Accepted R = Valid MPN not on file at COD P = Pending C = Closed I = Inactive E=Inactive due to the linking of a PLUS loan with an endorser
149	<MPNLinkIndicator>  MPN Link Indicator: The Master Promissory Note indicator is used to indicate whether or not the record has been linked to an MPN at COD.	NA	NA	No	Boolean	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 6th element in block	Boolean, value must be: true, or false	Value definitions for tag: true = Record has been linked to an MPN false = Record is not linked to an MPN
150	<MPNExpirationDate> MPN Expiration Date: Indicates the date when an MPN will expire.	10	10	No	Date	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 7th element in block	CCYY-MM- DD	—
151	<PaymentToServicerAmount>  Payment to Servicer Amount: Amount of payment sent to the Servicer by the borrower.	1	11	Yes	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 8th element in block	Value must be from - 99999999.99 - 99999999.99 max digits = 9 max fraction digits = 2	A negative amount indicates a payment. A positive amount indicates a reversal of the payment (that is, bounced check).

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
152	<PaymentToServicerDate>  Payment to Servicer Date: The date the Servicer posted the payment to the student's account.	10	10	No	Date	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 9th element in block	CCYY-MM- DD	—
153	<BookedAmount>  Booked Amount: Total net amount of disbursements accepted and booked	1	12	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS, TEACH <Response> 10th element in block	Value must be from 0 - 999999999.99	—
154	<BookedDate>  Booked Date: The date the loan booked on COD.	10	10	No	Date	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS, TEACH <Response> 11th element in block	CCYY-MM- DD	—
155	<LoanServicer>  Loan Servicer: The servicer assigned to a federal loan	0	50	No	String	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 11th element in block TEACH <Response> 16th element in block	—	—
156	<YTDDisbursementAmount>  Year-To-Date Disbursement Amount: For Pell and TEACH Grant, the total amount that has been disbursed to the student for the award year at all schools.	1	12	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 12th element in block Pell, TEACH <Response> 3rd element in block	Value must be from 0 - 999999999.99	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
157	<IASGEligible>  IASG Eligible identifies the student as eligible for Federal Pell Grant based on FAA certification.	—	—	No	Boolean	Simple Element		Boolean, value must be:  true, or false	Only returned for Pell awards having an IAS Grant = Yes or No
158	<CFHEligible>  CFH Eligible identifies the student as eligible for Federal Pell Grant based on FAA certification.	—	—	No	Boolean	Simple Element		Boolean, value must be:  true, or false	Only returned for Pell awards having a CFH Indicator = Yes or No
159	<CalculatedPublishedProgramLengthYears>  Calculated Published Program Length Years: The calculated published program length in years. When the published program length is submitted as weeks or months, the COD system converts the length to years.	1	7	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 14th element in block	Value must be between 0-999.999 Maximum 7 total characters including the decimal No more than 3 digits after the decimal	Only used for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
160	<AnticipatedSubUsagePeriod>  Anticipated Subsidized Usage Period: The period of time used by the student related to the reported loan. This is returned only when the reported loan has only anticipated disbursements	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 15th element in block	Value must be between 0-999.9 Maximum 5 total characters including decimal  No more than 1 digit after the decimal	Only used for DLSubsidized awards.
161	<ActualSubUsagePeriod>  Actual Subsidized Usage Period: The period of time used by the student related to the reported loan.  This is returned only when the reported loan has at least one actual disbursement.	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 16th element in block	Value must be between 0-999.9 Maximum 5 total characters including decimal No more than 1 digit after the decimal	Only used for DLSubsidized awards.
162	<AcademicYearLength>  Academic Year Length: The length of the student's Academic Year at the school, calculated using the Academic Year Begin and End dates.	1	4	No	Integer	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 17th element in block	Value must be between 0 - 9999	Only used for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
163	<LoanPeriodLength>  Loan Period Length: The length of the period of time covered by aid, calculated using the Financial Award Begin and End dates.	1	8	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 18th element in block	Value must be between 0-9999.999 Maximum 8 total characters including decimal  No more than 3 digits after the decimal	Only used for DLSubsidized awards.
164	<MaxSubEligibilityPeriod>  Maximum Subsidized Eligibility Period: The maximum period of time in which a student may receive a subsidized loan based on the published program length reported for the loan. It is equal to 150% of the calculated published program length in years.	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 19th element in block	Value must be between 0-999.9  Maximum 5 total characters including decimal  No more than 1 digit after the decimal	Only used for DLSubsidized awards.
165	<RemainingActualSubEligibility Period>  Remaining Actual Subsidized Eligibility Period: The remaining period of time in which the student may receive a Direct Subsidized Loan. This is returned when there is at least one actual disbursement for the reported loan. It is equal to the Maximum Subsidized Eligibility Period minus the Sum Actual Subsidized Usage Periods	1	6	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 20th element in block	Value must be between -999.9 and 999.9  Maximum 6 total characters including decimal  No more than 1 digit after the decimal	Only used for DLSubsidized awards.



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
166	<p>&lt;RemainingAnticipatedSubEligibilityPeriod&gt;</p> <p>Remaining Anticipated Subsidized Eligibility Period: The remaining period of time in which the student may receive a Direct Subsidized Loan. This is returned only when all disbursements for the the reported loan are anticipated. It is equal to the Maximum Subsidized Eligibility Period minus the Sum Anticipated Subsidized Usage Periods.</p>	1	6	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 21st element in block	<p>Value must be between -999.9 and 999.9 Maximum 6 total characters including decimal</p> <p>No more than 1 digit after the decimal</p>	Only used for DLSubsidized awards.
167	<p>&lt;SumAnticipatedSubUsagePeriods&gt;</p> <p>Sum Anticipated Subsidized Usage Periods: The sum of all actual subsidized usage periods for the student plus the anticipated subsidized usage period for the reported loan. . This is returned only when all disbursements for the the reported loan are anticipated.</p>	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 22nd element in block	<p>Value must be between 0-999.9 Maximum 5 total characters including decimal No more than 1 digit after the decimal</p>	Only used for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
168	<p>&lt;AnticipatedNonCredTeacherCertSubUsagePeriod&gt;</p> <p>Anticipated Non-Credential Teacher Certification Program Subsidized Usage Period: The period of time used by the student related to the reported loan. This is returned only when the Special Program is reported as Non-Credential Teacher Certification Program and the reported loan has only anticipated disbursements.</p>	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 23rd element in block	<p>Value must be between 0-999.9 Maximum 5 total characters including decimal</p> <p>No more than 1 digit after the decimal</p>	Only used for DLSubsidized awards.
169	<p>&lt;ActualNonCredTeacherCertSubUsagePeriod&gt;</p> <p>Actual Non-Credential Teacher Certification Program Subsidized Usage Period: The period of time used by the student related to the reported loan. This is returned only when the Special Program is reported as Non-Credential Teacher Certification Program and the reported loan has at least one actual disbursement.</p>	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 24th element in block	<p>Value must be between 0-999.9 Maximum 5 total characters including decimal</p> <p>No more than 1 digit after the decimal</p>	Only used for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
170	<p>&lt;RemainingActualNonCredTeacherCertSubEligibilityPeriod&gt;</p> <p>Remaining Actual Non-Credential Teacher Certification Program Subsidized Eligibility Period: The remaining period of time in which the student may receive a Direct Subsidized Loan while in enrolled in a Non-Credential Teacher Certification Program. This is returned when the Special Program reported is Non-Credential Teacher Certification and there is at least one actual disbursement for the reported loan. It is equal to the Maximum Subsidized Eligibility Period minus the Sum Actual Non-Credential Teacher Certification Subsidized Usage Periods.</p>	1	6	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 25th element in block	<p>Value must be between -999.9 and 999.9</p> <p>Maximum 6 total characters including decimal</p> <p>No more than 1 digit after the decimal</p>	Only used for DLSubsidized awards.
171	<p>&lt;RemainingAnticipatedNonCredTeacherCertSubEligibilityPeriod&gt;</p> <p>Remaining Anticipated Non-Credential Teacher Certification Subsidized Eligibility Period: The remaining period of time</p>	1	6	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 26th element in block	<p>Value must be between -999.9 and 999.9</p> <p>Maximum 6 total characters including decimal</p> <p>No more than 1 digit</p>	Only used for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	in which the student may receive a Direct Subsidized Loan while in enrolled in a Non-Credential Teacher Certification Program. This is returned when the Special Program reported is Non-Credential Teacher Certification and the reported loan has only anticipated disbursements. It is equal to the Maximum Subsidized Eligibility Period minus the Sum Anticipated Non-Credential Teacher Certification Subsidized Usage Periods.							after the decimal	
172	<p>&lt;SumAnticipatedNonCredTeacherCertSubUsagePeriods&gt;</p> <p>Sum Anticipated Non-Credential Teacher Certification Subsidized Eligibility Period: The sum of all actual Non-Credential Teacher Certification subsidized usage periods for the student plus the anticipated Non-Credential Teacher Certification subsidized usage period for the reported loan. This is returned only</p>	1	5	No	Decimal	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 27th element in block	<p>Value must be between 0-999.9 Maximum 5 total characters including decimal</p> <p>No more than 1 digit after the decimal</p>	Only used for DLSubsidized awards.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	when all disbursements for the reported loan are anticipated.								
173	<InformedBorrowingComplete>  The Informed Borrowing Complete field shall be set to 'true' if the borrower acknowledges their loan balance on StudentAid.gov.	NA	NA	Yes	Boolean	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 28th element in block	Boolean, value must be:  true, or false	Valid for AY 20- 21 and forward.
174	<InformedBorrowingCompletionDate>  Informed Borrowing Completion Date shall be set to the date that the Borrower acknowledges their loan balance on StudentAid.gov.	10	10	Yes	Date	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 29th element in block	CCYY-MM- DD	Valid for AY 20- 21 and forward.
175	<InformedBorrowingID>  The COD System shall send a unique Informed Borrowing ID. This ID is generated when a borrower acknowledges their loan balance.	1	18	Yes	Numeric	Simple Element	DLSubsidized, DLUnsubsidized, DLPLUS <Response> 30th element in block	Value must be from 1 - 99999999999999999999	Valid for AY 20- 21 and forward.
176	<ApplicationSubmissionReason>  Application Submission Reason: Indicates the reason of the PLUS Application submission	NA	NA	No	String	Simple Element	DLPLUS <Response> 31st element in block	—	Value definitions for tag: New Application = Borrower is submitting a new application Loan Amount Increase = Borrower wishes to increase the original loan amount requested Loan Amount Decrease = Borrower wishes to

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									decrease the original loan amount requested
177	<PreviousApplicationID>  Previous Application ID: Indicates the previously submitted application ID	1	10	No	Integer	Simple Element	DLPLUS <Response> 32nd element in block	max value is 9999999999	—
178	<EndorserAmount>  Endorser Amount: Total amount of loan for which the endorser has agreed to co- sign.	1	12	No	Decimal	Simple Element	DLPLUS <Response> 33rd element in block	Value must be from 0 - 9999999999.99	—
179	<OriginalCreditDecisionStatus>  Original Credit Decision Status: The initial credit decision for a borrower	1	1	No	String	Simple Element	DLPLUS <Response> 34th element in block	—	Value definitions for tag: A = Accepted D = Denied
180	<CreditDecisionStatus>  PLUS Credit Decision Status: The status of the PLUS credit decision for the loan on COD.	1	1	No	String	Simple Element	DLPLUS <Response> 35th element in block	—	Value definitions for tag: A = Accepted D = Denied P = Pending
181	<CreditActionChoice>  Credit Action Choice: Indicates the action a borrower plans once the borrower has failed the credit check	1	1	No	String	Simple Element	DLPLUS <Response> 36th element in block	—	Value definitions for tag: A = Appeal Decision E = Pursue Endorser N = Not Pursue PLUS Loan (Process Additional Unsubsidized Loan if Eligible) U = Undecided

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
182	<CreditAppealStatus>  Credit Appeal Status: Indicates current status of a credit appeal	1	1	No	String	Simple Element	DLPLUS <Response> 37th element in block	—	Value definitions for tag: A = Appeal Accepted D = Appeal Denied P = Appeal Pending R = Appeal Closed Without Final Decision
183	<CreditDecisionDate>  PLUS Credit Decision Date: The date on which the credit check decision was processed.	10	10	No	Date	Simple Element	DLPLUS <Response> 38th element in block	CCYY-MM- DD	—
184	<CreditDecisionExpirationDate>  Credit Decision Expiration Date: Indicates the date on which a potential borrower's credit decision will expire, necessitating the need for another credit check prior to originating a PLUS loan.	10	10	No	Date	Simple Element	DLPLUS <Response> 39th element in block	CCYY-MM- DD	—
185	<CreditOverrideCode>  PLUS Credit Decision Override Code: The status of the credit checks for this loan on COD as a result of an override.	1	1	No	String	Simple Element	DLPLUS <Response> 40th element in block	—	Note: Ensure valid MPN is on file before submitting disbursements  Value definitions for tag: C = Credit overridden as a result of new credit information Provided E = Credit overridden as a result of an endorser's approval D = Credit denied as a result of an endorser's

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									denial N = Credit denied after pending L = Endorsed for a Lesser Amount  Note: This tag is no longer in use
186	<ApplicationLoanAmount>  Application Loan Amount: Total amount of loan requested by a borrower when completing a PLUS Application	1	12	No	Decimal	Simple Element	DLPLUS <Response> 41st element in block	Value must be from 0 to 999999999.99	—
187	<MaximumLoanIndicator>  Maximum Loan Indicator: Indicates whether the borrower wants to borrow the maximum loan amount determined by the school	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 42nd element in block	Boolean, value must be:  true, or false	Value definitions for tag: true = Borrower has requested maximum loan amount as determined by the school false = Borrower has not requested the maximum loan amount
188	<UnknownLoanAmount>  Unknown Loan Amount: Indicates that the borrower does not know the Loan Amount for the PLUS Application	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 43rd element in block	Boolean, value must be:  true, or false	Value definitions for tag: true = The borrower selected does not know the loan amount false = The borrower selected does know the loan amount



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
189	<ApplicationCompleteDate>  Application Complete Date: Date a PLUS Application was completed by a borrower	10	10	No	Date	Simple Element	DLPLUS <Response> 44th element in block	CCYY-MM- DD	—
190	<AwardRangeRequestStartDate> Award Range Requested Start Date: The start date for which the borrower is requesting the loan for	7	7	No	Year Month	Simple Element	DLPLUS <Response> 45th element in block	CCYY-MM	—
191	<AwardRangeRequestEndDate>  Award Range Requested End Date: The end date for which the borrower is requesting the loan for	7	7	No	Year Month	Simple Element	DLPLUS <Response> 46th element in block	CCYY-MM	—
192	<DefermentOption>  Deferment Option: Repayment deferment option based upon enrollment status of the student	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 47th element in block	Boolean, value must be: true, or false	Value definitions for tag: true = Deferment Option utilized false = Deferment Option not utilized
193	<SixMonthDefermentOption>  Six Month Deferment Option: Indicates if the borrower wants to defer repayment of their Direct PLUS Loan for 6 months beginning on the date the student on whose	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 48th element in block	Boolean, value must be: true, or false	Value definitions for tag: true = Six Month Deferment Option utilized false = Six Month Deferment Option not utilized

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	behalf the loan was obtained ceases to be enrolled on at least a half- time basis								
194	<SchoolCreditBalanceOption>  School Credit Balance Option: Indicates whether any remaining credit balance should be applied to the school	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 49th element in block	Boolean, value must be:  true, or false	Value definitions for tag: true = Remaining balance should be applied to school false = Remaining balance should be applied to borrower
195	<CreditBalanceOption>  Credit Balance Option: Indicates whether a credit balance on a loan should be directed to the student or the borrower	1	1	No	String	Simple Element	DLPLUS <Response> 50th element in block	Enumeration, value must be: B, or S	Value definitions for tag: B = Borrower S = Student
196	<CreditActionStatus>	1	1	No	String	Simple Element	DLPLUS <Response> 51st element in block	—	Valid definitions for tag: D = Credit denied as a result of an endorser's denial N = The credit decision has changed from pending to denied or accepted. L = Endorsed for a Lesser Amount
197	<ReconsiderationEligible>	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 52nd element in block	Boolean, value must be: true, or false	—
198	<PLUSCounselingCompleted>	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 53rd element in block	Boolean, value must be:  true, or false	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
199	<PLUSCounselingCompleteDate>	NA	NA	No	Date	Simple Element	DLPLUS <Response> 54th element in block	CCYY-MM- DD	—
200	<PLUSCounselingException>	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 55th element in block	Boolean, value must be: true, or false	Reserved for future use by COD.
201	<CreditRequirementsMet>	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 56th element in block	Boolean, value must be: true, or false	—
202	<EndorserApproved>	NA	NA	No	Boolean	Simple Element	DLPLUS <Response> 57th element in block	Boolean, value must be: true, or false	—
203	<PLUSCounselingExpirationDate>	NA	NA	No	Date	Simple Element	DLPLUS <Response> 58th element in block	CCYY-MM- DD	Reserved for future use by COD.
204	<RelationshipToStudent>	1	1	Yes	String	Simple Element	DLPLUS <Response> 59th element in block	Enumerated value list, value must be: P, A, S, or O	For future use. Valid definitions for tag: P: Biological Parent of the Dependent Undergraduate Student A: Legal Adoptive Parent of the Dependent Undergraduate Student S: Spouse of the Biological or Legal Adoptive Parent of the Dependent Undergraduate Student and am considered to be a parent in accordance with the instructions on the Free Application for Federal Student Aid (FAFSA) for reporting my income and assets on the

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									FAFSA O: Other
205	<TotalEligibilityUsed>  Total Eligibility Used: For Pell, total percentage of the student's annual Pell eligibility used for all schools for the specific award year.	1	7	No	Decimal	Simple Element	Pell , TEACH <Response> 4th element in block	Value must be between 0-999.999 max digits: 6 max fraction digits: 3	TEU = Sum of all EU percentages for each applicable award year at all attended schools
206	<ScheduledGrant>  Scheduled Grant: Scheduled amount for a full-time student.	1	12	Yes	Decimal	Simple Element	Pell, TEACH <Response> 5th element in block	Value must be between 0 - 999999999.99	.—
207	<NegativePendingAmount> Negative Pending Amount: The amount by which the Pell award is overpaid (i.e., sum of disbursements exceeds Award Amount). School must adjust either award amount or disbursement amount within 30 days to avoid a COD-generated negative disbursement.	1	12	No	Decimal	Simple Element	Pell <Response> 6th element in block  TEACH <Response> 12th element in block	Value must be between 0 - 999999999.99	.—
208	<FSACode>  FSA Code: Code set to inform institutions of modifications that have been made to their database and require immediate action to rectify.	2	2	No	String	Simple Element	Pell <Response> 7th element in block  TEACH <Response> 13th element in block	Enumeration, value must be: SA, CE, or PO	Value definitions for tag: SA = Pell Shared SAR CE = Pell Grant/TEACH Grant Concurrent Enrollment PO = Pell POP Tag occurs max of 3 times per block

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
209	<FPSVerificationIndicator>  FPS Verification Indicator: Indicates whether this student has been selected for verification by the FPS on any transaction number for this award year.	NA	NA	No	Boolean	Simple Element	Pell, <Response> 8th element in block	Boolean, value must be:  true, or false	Value definitions for tag: true = Student selected for verification by FPS false = Student not selected for verification by FPS.
210	<HighestFPSTransactionNumber>  Highest FPS Transaction Number: Indicates the highest transaction number on FPS for this student and award.	2	2	No	Integer	Simple Element	Pell <Response> 9th element in block	Value must be between 1- 99	—
211	<LifetimeEligibilityUsed>  Lifetime Eligibility Used: The total percentage of the student's annual Pell eligibility used for all schools across all award years.	1	8	No	Decimal	Simple Element	Pell <Response> 10th element in block	Value must be between 0 - 9999.999  max digits: 7  max fraction digits: 3	Note: Beginning in July 2012, this tag is for Pell awards for 2010-11 Award Years and forward.
212	<NewFPSTransactionNumber>  New FPS Transaction Number: FPS transaction number of the most recent subsequent transaction.	1	2	No	Integer	Simple Element	Pell <Response> 16th element in block	Value must be between 1 - 99	Reserved for future use by COD.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
213	<ProfessionalJudgmentFlag>  Professional Judgment Flag: Indicates whether Professional Judgment was used on the most recent subsequent transaction.	0	1	No	String	Simple Element	Pell <Response> 20th element in block	—	Reserved for future use by COD.
214	<ElectronicAgreementToServeIndicator>  Electronic Agreement To Serve or Repay Indicator: This tag specifies if the Agreement To Serve or Repay was completed electronically on StudentAid.gov Website.	NA	NA	No	Boolean	Simple Element	TEACH <Response> 6th element in block	Boolean, value must be: true or false	Note: Although a value of false does not violate schema rules, no Paper Agreement To Serve or Repay currently exists and this field should equal true.  Value definitions for tag: true = Electronic Agreement To Serve false = Paper Agreement To Serve
215	<AgreementToServeID>  Agreement To Serve ID: The unique Agreement To Serve identifier printed on the Agreement To Serve.	0	23	No	String	Simple Element	TEACH <Response> 7th element in block	—	Student's Social Security Number: 000010001- 999999998 Agreement to Serve or Repay Type: C = TEACH Program Year: 26, for 2025-26 First six digits of school OPEID: 000000-099990 Agreement To Serve or Repay Sequence Number: 001- 999

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
216	<AgreementToServeStatusCode>  Agreement To Serve Status Code: The status of the Agreement to Serve on file at COD.	1	1	No	String	Simple Element	TEACH <Response> 8th element in block	—	Value definitions for tag: A = Accepted R = Rejected Agreement to Serve or Repay or valid Agreement to Serve or Repay not on file at COD P = Pending C = Closed
217	<AgreementToServeLinkIndicator>  Agreement To Serve Link Indicator: The Agreement to Serve link indicator is used to indicate whether or not the record has been linked to an Agreement to Serve at COD.	NA	NA	No	Boolean	Simple Element	TEACH <Response> 9th element in block	Boolean, value must be: true, or false	Value definitions for tag: true = Record has been linked to an Agreement to Serve or Repay false = Record is not linked to an Agreement to Serve or Repay
218	<EditProcessResult>  Edit Process Result: A complex element. This element provides a logical grouping of elements related to the edit response information.	NA	NA	NA	NA	Complex Element	DLSubsidized, DLUnsubsidized, DLPLUS, Pell, , , TEACH <Response> 2nd element in block	—	—
219	<ResponseErrorCode>  Response Error Code: Edit result from COD processing.	0	3	No	String	Simple Element	<EditProcessResult> 1st element in block	—	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
220	<ResponseMessage>  Response Message: The text of the edit result. This field is transmitted only via web applications.	1	150	No	String	Simple Element	<EditProcessResult > 2nd element in block	See Volume 2, Section 4 - COD Edits.	—
221	<ResponseErrorField>  Response Error Field: The tag referenced by the Edit Code.	0	200	No	String	Simple Element	<EditProcessResult > 3rd element in block	—	—
222	<ResponseErrorValue>  Response Error Value: New value in field if a correction is applied.	0	150	Yes	String	Simple Element	<EditProcessResult > 4th element in block	—	—
223	<ReportedValue>  Reported Value: The value reported by the school in the tag contained in the <ResponseErrorField> tag.	0	150	No	String	Simple Element	<EditProcessResult > 5th element in block	—	—
224	<PreviousSequenceNumber>  PreviousSequenceNumber: The previous disbursement sequence number on the COD database for the disbursement number. This tag is returned on all disbursement responses with a Disbursement Sequence Number greater than	1	2	Yes	Integer	Simple Element	<DisbursementNumber=" "> 3rd element in block	Value must be between 1 - 99	—



Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
	one, including COD system-generated responses.								
225	<ResponseFinancialSummary>  Response Financial Summary: A complex element. This element provides a logical grouping of elements related to summary information.	NA	NA	NA	NA	Complex Element	Located within <Response> block of <ReportingSchool> 1st element in block	max occurs 120	—
226	<TotalCountAccepted>  Total Number Accepted: Total number of accepted awards in this document. This information is summarized by award type and by award year.	1	9	No	Integer	Simple Element	<ResponseFinancialSummary> 4th element in block	Value must be between 0 - 999999999	—
227	<TotalCountRejected>  Total Number Rejected: Total number of rejected awards in this document. This information is summarized by award type by award year.	1	9	No	Integer	Simple Element	<ResponseFinancialSummary> 5th element in block	Value must be between 0 - 999999999	—
228	<TotalCountCorrected>  Total Number Corrected: Total number of corrected awards in this document. This information is summarized by award type by award year.	1	9	No	Integer	Simple Element	<ResponseFinancialSummary> 6th element in block	Value must be between 0 - 999999999	—

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
229	<TotalCountDuplicate>  Total Number Duplicate: Total number of duplicate awards in this document. This information is summarized by award type by award year.	1	9	No	Integer	Simple Element	<ResponseFinancialSummary> 7th element in block	Value must be between 0 - 999999999	—
230	<TotalCountVerificationSelected>  Total Number Verified: Total number of students in this document that are reported selected for verification by FPS. This information is summarized by award type by award year.	1	9	No	Integer	Simple Element	<ResponseFinancialSummary> 8th element in block	Value must be between 0 - 999999999	—
231	<TotalCountSSAAdministration>  Total Number SSA Match: Total number of students in this document that are reported by FPS to have an SSA match not equal to 4. This information is summarized by award type by award year.	1	9	No	Integer	Simple Element	<ResponseFinancialSummary> 9th element in block	Value must be between 0 - 999999999	—
232	<TotalFinancialAwardAccepted>  Total Financial Award Accepted: The total dollar amount accepted in this document.	1	15	No	Decimal	Simple Element	<ResponseFinancialSummary> 12th element in block	Value must be between 0 - 999999999999.99	For Pell Grant, TEACH Grant, and Direct Loan, this is the accepted award amount. This information is summarized by year by award type.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
233	<TotalFinancialDisbursementAccepted>  Total Financial Disbursement Accepted: The total dollar amount accepted in this document.	1	16	No	Decimal	Simple Element	<ResponseFinancialSummary> 13th element in block	Value must be between (-99999999999999999999.99) - 99999999999999999999.99	For Pell and TEACH Grant, the total disbursement amount accepted. For Direct Loan, the total gross disbursement amount accepted, regardless of the Disbursement Release Indicator. This information is summarized by year by award type.
234	<TotalFundedDisbursementAccepted>  Total Funded Disbursement Accepted: The total dollar amount funded in this document.	1	16	No	Decimal	Simple Element	<ResponseFinancialSummary> 14th element in block	Value must be between (-99999999999999999999.99) - 99999999999999999999.99	For Pell and TEACH Grant, the total disbursement amount accepted with a Disbursement Release Indicator of "true." For Direct Loan, the total net disbursement amount accepted with Disbursement Release indicator of "true." This information is summarized by award type by award year.
235	<TotalNonFundedDisbursementAccepted>  Total NonFunded Disbursement Accepted: The total dollar amount not funded in this document.	1	16	No	Decimal	Simple Element	<ResponseFinancialSummary> 15th element in block	Value must be between (-99999999999999999999.99) - 99999999999999999999.99	For Pell and TEACH Grant, the total disbursement amount accepted with a Disbursement Release Indicator of "false." For Direct Loan, the total net disbursement amount accepted with Disbursement Release indicator of "false." This information is summarized by award type by award year.

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
236	<TotalFinancialAwardCorrected> Total Amount Corrected: The total dollar value reported in this document for corrected Pell disbursements.	1	15	No	Decimal	Simple Element	<ResponseFinancialSummary> 16th element in block	Value must be between 0 - 999999999999.99	This information is summarized by award type by award year.
237	<Receipt>  Receipt: A date time stamp indicating receipt of the document at COD.	0	None	No	DateTime	Simple Element	Within <CommonRecord> block, 3rd element only in Receipt file	—	Note: Currently not in use.
238	<DocumentTypeCode>  Document Type Code: This element indicates the code corresponding to the type of data being returned in the document.	2	2	No	String	Simple Element	Common Record <Response> 1st element in block	—	Value definitions for tag:  BN = Response - Booking Notification  ND =Response - Negative Disbursement PS = Response - Payment to Servicer PN = Response - Promissory Note RC = Receipt (Not in use) RS = Response SG = Response - System-Generated (Not in use) WB =Response - Web-Initiated AT = Agreement Response AC = Response - TEACH Grant Counseling SP = Response - PLUS Application Acknowledgement

Field #	COD Data Field	Min Length	Max Length	Nullable ?	Data Type	Field Type	Complex Element Sequence	Valid Schema Values	Other COD Rules
									EC = Response - Counseling Acknowledgement SU = Response - SULA Acknowledgement PC = Reserved for future use OF = Response- Origination Fee and Interest Rebate CS= Response- Credit Status
239	<DocumentStatusCode>  Document Status Code: The status of the processed document on COD.	1	1	No	String	Simple Element	Common Record <Response> 2nd element in block	Enumeration, value must be: A, R, or D	Value definitions for tag: A = Accepted R = Rejected D = Duplicate (Not in use)
240	<ProcessDate>  Process Date: The date the document information was processed at COD.	10	10	No	Date	Simple Element	Common Record <Response> 3rd element in block	—	—

Table 74: Response Information  
 An em dash or “—” indicates no data.

## Common Record Physical Layout

This section provides standards for the physical layout of the Common Record XML Document file. Standards on the physical layout of the Common Record XML Document file are required to ensure all systems transmitting or processing an instance of the file can do so without encountering physical constraint errors.

Examples of physical constraint errors include exceeding available memory, exceeding available disk space, or exceeding available network bandwidth (and timing out). While most physical constraint errors can be avoided by proper coding techniques on the host system, there are some error conditions best handled through the definition of, and adherence to, a set of well-defined and well-publicized standards. Such error conditions and their corresponding standards for resolution are provided in this section.

XML and its associated technologies, (XML Schema, Document Type Definitions), do not provide for a mechanism to define the physical layout of a file. In fact, XML does not depend on the physical layout of the elements by design. White space and line lengths are not relevant to the logical construction and reading of an XML document. Therefore, the Common Record XML file physical layout standards are defined as guidelines and examples presented in this Section.

### LINE LENGTH LIMITATIONS

#### 32-KILOBYTE LINE LENGTH LIMITATION ON MAINFRAME SYSTEM

Some mainframe systems cannot create or read a line longer than 32 kilobytes. A line consists of a string of data with an “end of line marker.” The phrase “end of line marker” in this document refers to whatever mechanism is used on a platform to terminate an individual line or record. For example, an end of line marker can be set by the writing out of a record (on a mainframe), by inserting a <CR><LF> character sequence (on a PC), or by inserting a <CR> character (on UNIX). <CR> (carriage return character) and <LF> (linefeed) are ASCII codes 13 and 10, respectively.

Systems with this limitation cannot handle a string of data longer than 32 kilobytes without encountering some type of data corruption (most likely truncation). By rule, XML ignores white space, which includes tabs, linefeeds, and carriage returns. Since XML has no means to regulate line lengths, a separate standard must be set to ensure lines do not exceed 32 kilobytes.

#### 9,999-BYTE LINE LENGTH LIMITATION ON COD SYSTEM

The COD System cannot process documents that contain over 9,999 bytes per line. A line consists of a string of data with an “end of line marker.” The phrase “end of line marker” in this document refers to whatever mechanism is used on a platform to terminate an individual line or record. For example, an end of line marker can be set by the writing out of a record (on a mainframe), by inserting a <CR><LF> character sequence (on a PC), or by inserting a <CR> character (on UNIX). <CR> (carriage return character) and <LF> (linefeed) are ASCII codes 13 and 10, respectively. COD will not process or acknowledge Common Record Documents that are submitted with a string of data greater than 4,000 bytes.

## LINE LENGTH LIMITATION SOLUTION

The solution, in its general form, is to make sure an end of line marker is always set before a particular output stream of data reaches 9,999 bytes. This end of line marker should be created in the format native to the system where the file is being created.

The following standard is a strongly recommended approach for schools and vendors who want to guarantee their files will not exceed the 9,999 byte limitation. If a school or vendor can ensure their submitted files will not exceed the 9,999 byte limitation by some other means, those files will be accepted by COD. However, the burden of responsibility will then rest with the school or vendor for files incorrectly submitted.

The data transmission software used by COD and by participating schools handles the translation of end of line markers across platforms. For example, if a file were sent from a PC to a UNIX box, the <CR><LF> character sequence would be automatically changed to <CR> characters. Therefore, the insertion of an end of line marker does not have to take into consideration the platform of the destination system. This same principle holds true between mainframes (EBCDIC or ASCII), PCs and UNIX boxes.

## STANDARD

In order to ensure no line grows larger than 9,999 bytes, all Common Record XML files submitted to COD should be constructed with end of line markers inserted at specified points in the document. These points are tied to specific elements in the XML document. The points are:

- After the AttendedSchool element opening tag, <AttendedSchool>
- After every Student element closing tag, </Student>
- Before beginning an "Award" element opening tag, which could be <Pell>, <TEACH>, <DLSubsidized>, <DLUnsubsidized>, <DLPLUS>, and the opening tags of all other elements designated as part of the Award substitution group in the Common Record XML Schema specification
- Before beginning a Disbursement, element opening tag, <Disbursement>, for every disbursement under each of the "Award" elements listed above.

The Common Record XML Schema has been evaluated to confirm that if the above standard is maintained, the maximum size of the data sent in any one of these lines will never exceed 9,999 bytes. The maximum line size takes into account all tags, all maximum data lengths for each element, and all maximum numbers of repetitions of nested data elements.

The following example found is a skeleton submission file correctly formatted according to the end of line marker standards. In this example, for clarity, sub-elements are not listed, and the characters, [EOL], end of line, explicitly mark the end of a line.

COD guarantees the Response Document files it produces will not contain lines longer than 9,999 bytes, but the files will not necessarily match the line breaks as specified for submissions. This is due in part to the additional space used by the Response blocks.

## Common Record Response File Options

For more information on the length of COD Response Files, please refer to the School Options topic in Volume 2, Section 1 – Implementation Guide for more information.

## CODING GUIDELINES

The code should track the Common Record elements as they are written to the output stream and write out a line of XML text (via the appropriate end of line marker) as any of the EOL points are encountered. Code to construct the Common Record can vary greatly depending on the platform, libraries, and languages used, so specific examples are not provided.

```
<CommonRecord><!--All Common Record sub elements -->
<ReportingSchool><AttendedSchool> [EOL]
<Student><!--All Student sub elements until an Award is encountered-->[EOL]
<Pell><!--All Pell sub elements until a Disbursement is encountered-->[EOL]
<Disbursement><!-- sub elements --></Disbursement>[EOL]
<Disbursement><!-- sub elements --></Disbursement>[EOL]
<Disbursement><!-- sub elements --></Disbursement></Pell>[EOL]
<DLSubsidized><!--All DLSubsidized sub elements until Disbursement is encountered-->[EOL]
<Disbursement><!-- sub elements --></Disbursement>[EOL]
<Disbursement><!-- sub elements --></Disbursement>[EOL]
<Disbursement><!-- sub elements --></Disbursement></ DLSubsidized ></Student>[EOL]
<DLSubsidized><!--All DLSubsidized sub elements until Disbursement is encountered-->[EOL]
<Disbursement><!-- sub elements --></Disbursement></ DLSubsidized ></Student>[EOL]
</AttendedSchool></ReportingSchool></CommonRecord>[EOL]
</AttendedSchool><AttendedSchool>[EOL]
<Student><!--All Student sub elements until an Award is encountered-->[EOL]
```



# Section 4:

## Edits

For more information regarding the business rules that govern the logic supporting these edits, please refer to the Response Documents and Response Codes topics of Volume 2, Section 1 – Implementation Guide.

For all Common Records received and processed by the COD System, the COD System returns a Response document indicating the status of Common Record processing, including any rejected data elements and reasons for rejection. The rejection reasons are indicated in the response through a series of Edit codes, which are described in further detail throughout this section.

For Grant Data Request Edit Codes, please refer to the Data Request topic in Volume 6, Section 7 – COD Reports of this Technical Reference.

## Introduction

This section provides the Edits table, which lists COD system edit information grouped according to the following column headings:

- Number – Edit Number
- Edit Type – May be one of the following:
  - R (Reject)
  - W (Warning)
  - C (Correcting)
- Message – The Edit message
- Condition – The logical conditions that must be satisfied in order to trigger the edit
- Award Types Affected – The programs (Pell, TEACH Grant, Direct Loan, Iraq and Afghanistan Service Grant) that are impacted by the edit

How to Fix Record – Instructions on how to update and resubmit the record properly to avoid triggering the edit

If you have any questions regarding the information contained in this document, please contact the FSA Partner and School Relations Center at the following phone number:

- FSA Partner and School Relations Center 1-800-848-0978

Staff is available Monday through Friday, 8am-11pm Eastern Time. Or, please email FSA School Partner and School Relations Center at [codsupport@ed.gov](mailto:codsupport@ed.gov).

For more information regarding the business rules that govern the logic supporting these edits, please refer to the Response Documents and Response Codes topics of Volume 2, Section 1 – Implementation Guide.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
001	R	Document	Invalid Destination Mailbox ID	The Entity ID is invalid or not assigned to send Pell and Direct Loan data from that Destination Mailbox.	Pell Grant TEACH Grant Direct Loan	Resubmit data using the appropriate Destination Mailbox ID.
002	R	Award	Reporting Entity ID is not found in the COD System	Reporting School Entity ID is not eligible to report.	Pell Grant TEACH Grant Direct Loan	Resubmit using appropriate reporting school entity ID.
003	R	Document	Duplicate Document ID	Document ID has been previously submitted.	Pell Grant TEACH Grant Direct Loan	Review document to determine if duplicate. If not, resubmit with unique Document ID number.
004	R	Document	Entity ID (Source) Not Found On Participant File	The Entity ID submitted does not match any existing Entity ID on file at COD.	Pell Grant TEACH Grant Direct Loan	Verify your Source Entity ID. For further clarification, if needed, call your Customer Service Representative.
005	R	Document	Schools cannot submit Legacy Records for this program and award year	A Source Entity that is a participant for this program and award year has submitted a legacy record.	Pell Grant TEACH Grant Direct Loan	Resubmit data using the appropriate XML Common Record or contact COD Customer Service to change school's status for that program and award year. See COD Technical Reference

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
						Volume 2 Section 3 – Common Record Layout for more information.
006	R	Document	Document Create Date Greater Than Current System Date	The date indicated in the Date/Time stamp in the Document ID is greater than the current system date at COD.	Pell Grant TEACH Grant Direct Loan	Correct Document (Batch) ID Create Date Time and resubmit.
007	R	Document	No Detail Records In Document	The Document (Batch) contained no detail records, and cannot be processed.	Pell Grant TEACH Grant Direct Loan	Resubmit Document (Batch) with detail records.
008	W	Entity	Reported Number of Students Does Not Equal Detail Count	The Reported Total Number of Students reported in the Document Information Block does not equal the total number of Students in the Document (Batch).	Pell Grant TEACH Grant Direct Loan	No action required.
011	R	Person	For Pell and TEACH Grant: No Eligible SSN, DOB, and Last Name Combination Match Found On <b>FPS</b> For Student. (Last Name match is on first 2 characters only) For DL:No Eligible SSN and DOB Combination Match Found On <b>FPS</b> For Student (No match on Last Name is done)	This condition applies to NEW students and NEW awards. A NEW student is defined as a student whose SSN does not already exist in COD. A new award is submitted for a new student, AND the combination of SSN, DOB and Last Name (Pell only) does not match ANY Transaction Number on <b>FPS</b> for that award year*. * If the award period extends across July 1, COD will attempt to match the Student Identifier (SSN, DOB and Last Name) on FPS from two award years. If the academic begin date is prior to July 1, 2016 and the academic end date is after July 1, 2016, COD will attempt to match the Student Identifier on CPS for 2015-16 and 2016-17.  NOTE: Applicable for all award years for Pell, Direct Loan Sub and Unsub, and TEACH. Applicable for Direct PLUS Loan and Grad PLUS for Award Year 2011-12 and forward	Pell Grant TEACH Grant Direct Loan	Compare SSN, Date of Birth and Last Name combination reported in the Common Record to the same data elements on the student's ISIR based on the reported <b>FPS</b> Transaction Number. If any of these identifiers do not match, resubmit with the corrected data.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
012	R	Person, Award	For Pell and TEACH Grant: No Eligible SSN, DOB, and Last Name Combination Match Found On <b>FPS</b> For Student. (Last Name match is on first 2 characters only) For DL: No Eligible SSN and DOB Combination Match Found On <b>FPS</b> For Student (No match on Last Name is done)	This condition applies for EXISTING students and EXISTING awards. An EXISTING student is defined as a student whose SSN already exists in COD. An Identifier change is submitted in the simple element tags, and/or of the Common Record for an EXISTING award, AND the combination of SSN, DOB and Last Name (Pell only), and the <b>FPS</b> Transaction Number does not match <b>FPS</b> for that award year*. * If the award period extends across July 1, COD will attempt to match the Student Identifier (SSN, DOB and Last Name) on <b>FPS</b> from two award years. If the academic begin date is prior to July 1, 2010 and the academic end date is after July 1, 2010, COD will attempt to match the Student Identifier on CPS for 2009-2010 and 2010-2011.  NOTE: Applicable for all award years for Pell, Direct Loan Sub and Unsub, and TEACH. Applicable for Direct PLUS Loan and Grad PLUS for Award Year 2011-12 and forward.	Pell Grant TEACH Grant Direct Loan Direct PLUS Loan	If the student's identifiers have changed, confirm the change has been reported to <b>FPS</b> before submitting the simple elements to COD.
013	R	Person	Citizenship Status Indicator – PLUS Borrower is not eligible	PLUS Borrower's Citizenship Status Indicator is not "1" for U.S. citizen or "2" for eligible non-citizen	Direct PLUS Loan	If this data is correct, the PLUS borrower is not eligible for a PLUS loan.  If this data is incorrect, update and resubmit.
014	R	Award	Citizenship Status is not eligible for this award	For PLUS, Student's Citizenship Status Indicator is not "1" for U.S. citizen or "2" for eligible non-citizen. For Pell and TEACH Grant, Student's Citizenship Status Indicator is not "1" for U.S. Citizen or "2" for eligible non-citizen.  NOTE: Applicable for all award years for Pell, Direct Loan Sub and Unsub, and TEACH.	Pell Grant TEACH Grant Direct Loan Direct PLUS Loan	If this data is correct, the student is not eligible for a loan. If this data is incorrect, update and resubmit. For grants, if the <CitizenshipStatusCode> was not submitted on the common record, it may be required if the student citizenship status could not be confirmed on the corresponding FPS transaction.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
016	R	Person, Award	If award year is prior to 2005-2006 OR the Student Level Code is less than or equal to 5, PLUS Borrower and Student CANNOT be the same person. If award year is 2005-2006 or later AND the Student Level Code is 6 or greater, the PLUS Borrower and Student MUST be the same person.	<p>This edit applies in 3 different conditions:</p> <p>If the award year is &lt; 2005-2006 and the PLUS borrower has the same SSN as the student associated with the PLUS loan.</p> <p>If the award year is &gt;=2005-2006 and the PLUS borrower has the same SSN as the student associated with the PLUS loan AND the Grade Level &lt;6.</p> <p>When a change to only the Student SSN was attempted for a PLUS award where the Borrower and Student have the same SSN.</p> <p>NOTE: Only applicable for Award Years 2007-2008 and prior. For awards years 2008-09 and forward, Edits 150, 151, 152, and 153 will apply.</p>	Direct PLUS Loan	<p>How to fix Condition 1: Verify the SSN of the borrower and the student is not equal. Update records as appropriate and resubmit.</p> <p>How to fix Condition 2: Verify the SSN of the borrower and student is not equal. If they are, ensure the student's Grade Level is &gt;= 6. Update records as appropriate and resubmit.</p> <p>How to fix Condition 3: Resubmit the SSN change for the Borrower only or resubmit the SSN change for the Borrower and Student.</p>
017	R	Person	PLUS Endorser and Student Cannot be the Same Person	The PLUS endorser has the same SSN as the student associated with this PLUS loan.	Direct PLUS Loan	Verify the SSN of the endorser and the student. Update records appropriately and resubmit.
020	R	Person	First and Last Name Blank	First Name and Last Name are both blank.	Pell Grant TEACH Grant Direct Loan	Submit first name, last name or both.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
021	R	Person	Address is Incomplete	<p>A complete address is defined as when at least one occurrence of each of the following is present:            AddressLine City            StateProvinceCode PostalCode            CountryCode (only required for foreign addresses)            For Pell, TEACH Grant and Direct Loan (Subsidized and Unsubsidized):            The student's address is incomplete on the incoming record, on <b>FPS</b>, and in the COD database.            For Direct PLUS Loan: The borrower's address is incomplete on the incoming record, on <b>FPS</b> and/or the COD database.</p>	Pell Grant TEACH Grant Direct Loan	If rejected, update and resubmit address information.
023	C/R	Award	Incorrect Low Tuition & Fees Code/Correction Applied	<p>The Cost of Attendance as reported by the school (either in the record or as previously reported) is greater than the low tuition threshold or the student's EFC is greater than the Low Tuition and Fees minimum amount for the award year.            If the school has chosen to have COD correct its records, COD will set Low Tuition and Fees to blank.</p> <p>NOTE: Edit 023 will not be triggered for incoming Pell awards for the 2008- 2009 Award Year and forward.</p>	Pell Grant	Review the COA and EFC and confirm. If correct, no action required. If incorrect, update and resubmit.
024	R	Award, Person	Reported <b>FPS</b> Transaction Number Does Not Match <b>FPS</b>	<p>There are three separate conditions that would return this edit.</p> <p>1. This edit applies to NEW students and NEW awards. A NEW student is defined as a student who's SSN does not already exist in COD.</p> <p>A NEW award is submitted for a NEW student, AND the combination of SSN, DOB and Last Name (Pell only) does not match that SPECIFIC Transaction Number on <b>FPS</b> for that award year*.</p> <p>2. This edit applies to EXISTING students with a NEW award. An EXISTING student is defined as a student who's SSN already exists in COD.</p> <p>A NEW award is submitted for an EXISTING student, AND the combination of SSN, DOB and Last Name (Pell only) does not match that SPECIFIC Transaction Number on <b>FPS</b> for that award year*.</p> <p>3. A CPS Transaction number change is submitted for an EXISTING student and award, AND the submitted Transaction number does not exist in <b>FPS</b> for that student.</p> <p>If the award period extends across July 1, COD will attempt to match the Student Identifier (SSN, DOB and Last Name) on <b>FPS</b> from two award years. For example, if the academic begin date is prior to July 1, 2021</p>	Pell Grant TEACH Grant Direct Loan Direct PLUS Loan	Compare SSN, Date of Birth and Last Name combination reported in the Common Record to the same data elements on the student's ISIR based on the reported <b>FPS</b> Transaction Number. If any of these identifiers do not match, resubmit with the corrected data. Review the Reported Transaction Number and ensure that you have an ISIR record on file for the student with that transaction number. If incorrect, update the Reported

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				and the academic end date is after July 1, 2021, COD will attempt to match the Student Identifier on CPS for 2020-2021 and 2021-2022.  NOTE: Applicable for all award years for Pell, Direct Loan Sub and Unsub, and TEACH. Applicable for Direct PLUS Loan and Grad PLUS for Award Year 2011-2012 and forward		Transaction Number and resubmit.
025	R	Award, Person	Duplicate Match on FPS	For Pell and TEACH Grant: The Student Identifier -- SSN, Date of Birth, first two characters of Last Name, and <b>FPS</b> Transaction Number combination reported in the COD Common Record has two or more matches on FPS. For Direct Loan and Direct PLUS Loan: The Student Identifier -- SSN, Date of Birth, and <b>FPS</b> Transaction Number combination reported in the COD Common Record has two or more matches on <b>FPS</b> .  NOTE: Applicable for all award years for Pell, Direct Loan Sub and Unsub, and TEACH. Applicable for Direct PLUS Loan and Grad PLUS for Award Year 2011-2012 and forward	Pell Grant TEACH Grant Direct Loan Direct PLUS Loan	Go to the COD website and review the <b>FPS</b> matches for this student. Select the correct transaction.
026	C/R	Award	Incorrect Secondary EFC Used/Correcti on Applied	Ensures the reported Secondary EFC Used Code is valid. The valid values are "O", "S", and "Blank." "O" is only valid if the value currently on the COD system is "S". If the school has chosen to have COD correct its records and an invalid value is submitted, COD will correct to the value currently on the COD system or to blank.  NOTE: Not applicable for Award Year 2005-2006 and forward.	Pell Grant	Review the field for the correct value and resubmit. Ensure the value is S if you are using the Secondary EFC; or O if you originally reported you were using the Secondary EFC and are now using the Original EFC.
033	R	Award	Duplicate Award ID	This Award ID is a duplicate and is already established under a different student identifier. This Award ID already exists for this student and the school is trying to change a component of the COD Award Identifiers (Attended Entity ID, award year, or Award Number). The COD Award Identifiers (Attended Entity ID, award year, or Award Number) already exist for this student and the school is trying to change the Award ID. (Direct Loan, and TEACH Grant only)	TEACH Grant Direct Loan	Create a new Award ID for this borrower.



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
034	R	Award	Attended School Entity Identifier has no relationship with the Reporting School Entity Identifier	The Attended School Entity Identifier has no established relationship to the Reporting School Entity Identifier in the Entity Block.	Pell Grant TEACH Grant Direct Loan	Verify the Attended Entity ID and the Reporting Entity ID. If incorrect, update and resubmit
035	R	Award	Inconsistent Award Information Data	For DL: Award Type listed in Award ID does not match Award Type in the Award Block and/or award year listed in Award ID does not match award year in Award Information Block and/or Award Sequence Number in the Award ID is not numeric and/or Direct Loan Code listed in the Award ID does not match the Direct Loan Code of the Attended School in the Award Block. For TEACH Grant: Award Type listed in Award ID does not match Award Type in the Award Block and/or award year listed in Award ID does not match award year in Award Information Block and/or Award Sequence Number in the Award ID is not numeric and/ 6-digit OPE ID listed in the Award ID does not match the first 6 digits of the OPE ID of the Attended School in the Award block.	TEACH Grant Direct Loan	Review the elements in the Award ID and/or award data elements, update so that the two are consistent and resubmit.
036	W	Award	PLUS Credit Decision Status is not accepted for this PLUS award	No credit decision has been accepted for this award.	Direct PLUS Loan	PLUS Credit Decision Status for this award is pending or declined.
038	R	Award	Student Not Pell Eligible	Award type listed is Pell and student is not Pell eligible according to <b>FPS</b> . NOTE: For Award Years 2010-11 through 2023-24 will not trigger when the IAS Grant field is set to 'true.'	Pell Grant	Review student's ISIR for Pell eligibility. If student is eligible, review transaction number reported. If incorrect, update and resubmit.
039	C/R	Award, Disbursement	Incorrect Award Amount	Award and/or Disbursement amount exceeds the maximum annual limit. For Pell:  Refer to the Federal Student Aid Handbook for maximum annual limits. A New Award Amount limit is used when originating and disbursing Pell awards that are subjected to any Disaster Relief, including Coronavirus Disaster Relief:  If the Additional Eligibility Indicator = "false" or not submitted, the	Pell Grant Direct Loan IASG	Pell: Review the maximum annual limit for this award. If appropriate, update this field and resubmit. Direct Loan: Review the maximum annual loan limit for this award. Also,

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record																														
				<div>award amount cannot exceed the Scheduled Federal Pell Grant +<table><tr><th>Grade Level</th><th>Subsidized Loan Amount</th><th>Combination Base Loan Limit</th><th>Combination Base Limit with Additional Unsubsidized Loan Limit</th><th>PPCI Loan Limit</th><th>HPPA (formerly HEAL eligible) Loan Limit</th></tr><tr><td>0, 1</td><td>\$3,500</td><td>\$5,500</td><td>\$9,500</td><td>—</td><td>—</td></tr><tr><td>2</td><td>\$4,500</td><td>\$6,500</td><td>\$10,500</td><td>—</td><td>—</td></tr><tr><td>3, 4</td><td>\$5,500</td><td>\$7,500</td><td>\$12,500</td><td>—</td><td>—</td></tr><tr><td>5</td><td>\$5,500</td><td>\$7,500</td><td>\$12,500</td><td>\$12,500</td><td>—</td></tr></table></div> <div> Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) at the school in the award year OR If the Additional Eligibility Indicator = "true" the Award Amount cannot exceed 1.5 times the Scheduled Federal Pell Grant +  Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) at the school in the award year  For Direct Loan:  For Iraq and Afghanistan Service Grant: Award Amount exceeds the student's Sequester-Limited Scheduled Award. Refer to Volume 2, Section 1 for more information on the Sequester-Limited Scheduled Award. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.</div>	Grade Level	Subsidized Loan Amount	Combination Base Loan Limit	Combination Base Limit with Additional Unsubsidized Loan Limit	PPCI Loan Limit	HPPA (formerly HEAL eligible) Loan Limit	0, 1	\$3,500	\$5,500	\$9,500	—	—	2	\$4,500	\$6,500	\$10,500	—	—	3, 4	\$5,500	\$7,500	\$12,500	—	—	5	\$5,500	\$7,500	\$12,500	\$12,500	—		<div>review all sub/unsub awards and actual disbursements made for this student. If appropriate, update award and/or disbursement amount(s) and resubmit. IASG: Review the Sequester- Required Changes to the Title IV Student Aid Programs for the applicable award year(s) and ensure the award amount does not exceed the Sequester- Limited Scheduled Award.</div>
Grade Level	Subsidized Loan Amount	Combination Base Loan Limit	Combination Base Limit with Additional Unsubsidized Loan Limit	PPCI Loan Limit	HPPA (formerly HEAL eligible) Loan Limit																															
0, 1	\$3,500	\$5,500	\$9,500	—	—																															
2	\$4,500	\$6,500	\$10,500	—	—																															
3, 4	\$5,500	\$7,500	\$12,500	—	—																															
5	\$5,500	\$7,500	\$12,500	\$12,500	—																															
040	W	Award	Changed Award Amount Is Less Than Total Disbursements	Award amount reported is less than the sum of the accepted funded disbursements. Decrease is expected within 30 days or a system-generated decrease is processed. (This edit is only executed if Disbursement Release Indicator equals True) NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant IASG	Reduce disbursement amounts to correspond with the funded disbursements and resubmit. If an adjustment is not received within 30 days, COD will process a decrease.																														

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
041	R	Award	Changed Award Amount Is Less Than Total Disbursements	Award amount reported is less than the sum of the accepted funded disbursements. (This edit is only executed if Disbursement Release Indicator equals True)	TEACH Grant Direct Loan	Review Award Amount and funded disbursements. Update and resubmit. If you are attempting to decrease the loan, you must make adjustments to the disbursements that have already been processed.
042	R	Award	New Award Type Submitted with a Zero Award Amount	For an initial submission for this award type, the award amount is not greater than zero.	Pell Grant TEACH Grant Direct Loan	Enter an Award Amount and resubmit. If the edit is received on an attempt to inactivate an award, the initial origination record was likely rejected, causing the award to not be built in COD.
043	R	Award	Award Received Prior to Start of Processing Year or New Award or Increase to the Award Amount is Received After the School is Confirmed Closed Out or After the End of Processing Year Without Reopen/Extended Processing	For Direct Loan, TEACH, Pell, and Iraq and Afghanistan Service Grant (IASG): COD System returns Edit 043 when: A new award was submitted prior to the beginning of the processing year OR A new award or an increase to the award amount is submitted after the school has closed out the program/award year (school or FSA confirmed) and the school has not been reopened OR A new award or an increase to the award amount is submitted after the data submission (closeout) deadline for the program/award year, and the school has not been granted Extended Processing.  The COD System shall NOT return Edit 043 when:  A decrease or non-financial change* to the award is submitted after the school has closed out the program/award year (school or FSA confirmed) and the school has not been reopened OR	Pell Grant TEACH Grant Direct Loan IASG	For records submitted prior to the beginning of the processing year, these records should be resubmitted within the eligible date range.  For records submitted after the school has closed out or after the data submission (closeout) deadline, review your records.  If you need to submit decreases to the

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				<p>A decrease or non-financial change* to the award is submitted after the data submission (closeout) deadline for the program/award year, and the school has not been granted Extended Processing</p> <p>*Non-financial changes are defined as any award-level maintenance except changes to Award Amount. Examples of non-financial changes: <b>FPS</b> Transaction Number, Award Start and End Dates, Verification Status, etc.</p> <p><b>NOTE:</b> The IASG program is applicable in COD for the 2017-18 through 2023-24 Award Year. Reopen/extended processing for IASG must be requested under the Pell program. If authorized, reopen/extended processing will apply to both programs for that award year.</p>		<p>award amount or non- financial changes, extended processing is not required. Make any corrections and resubmit only the decrease or non-financial change to COD.</p> <p>If you need to submit new or increased award amounts, you must request and be approved for an extension to the data submission deadline. Fill out the request form on the Request Reopen/Extended Processing page on the COD website. Requests will be reviewed on a case-by-case basis and must meet applicable regulatory requirements.</p>
045	R	Award	Incorrect Award Dates	Financial Award Begin Date is after the Financial Award End Date OR Financial Award Begin Date and Financial Award End Date is not equal to or within the student's academic year dates.	Direct Loan	Review the record and ensure the Award Begin and End Dates are accurate. If incorrect, update and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
046	R	Award	Incorrect Academic Year Dates	Incorrect Academic Year Dates Direct Subsidized Loan, Direct Unsubsidized Loan, Direct PLUS Loan for Award Year 2016 -2017 and forward. Academic Year Start Date is after the Academic Year End Date OR The Academic Year Begin and End Dates don't reflect the minimum length for an academic year. Refer to the FSA Handbook regarding minimum academic year length requirements. (Volume 3, Chapter 1)	Direct Loan	Review the record and ensure the Academic Year Begin (Start) and End Dates are accurate. If incorrect, update and resubmit.
047	R	Award	Academic Year Dates Already Linked to MPN or PLUS MPN	Academic Year Start and End Date cannot be changed because more than one Direct Loan is already linked to an MPN or a PLUS MPN based on specific academic year dates. (Direct Loan – MPN Single Year Feature only)	Direct Loan	Academic Year Begin (Start) Date cannot be changed on this loan since it is linked to an MPN or a PLUS MPN based on the existing Academic Year Begin (Start) and End Dates. If the academic year dates are incorrect, you must obtain a new MPN and process a new loan with the correct academic year dates.
048	R	Award, Disbursement	School Is Ineligible	For Pell: If any of the following are true: School is not eligible to participate in the Title IV programs. School is requesting Pell Grant funds and was not eligible to participate in the Pell Grant program at time the disbursement was made. School was not open at the time the funds were requested. School was undergoing an ownership change at the time the funds were requested. For Direct Loan: Reject Edit 048 is returned on the origination record and/or disbursement record when the record would result in: The loan's Earliest Disbursement Date being outside the attending school's period(s) of eligibility. The disbursement date of one or more actual disbursements (DRI=True) being after the date the attending school closed. A loan for a student attending a foreign school received no loans during the attending school's period of eligibility and the earliest disbursement	Pell Grant Direct Loan	Reporting School Entity ID is not eligible to report.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				date for that loan is after the attending school's loss of eligibility. School is requesting Direct Loan funds and was not eligible to participate in the Direct Loan program at the time the funds were requested. NOTE: The foreign school requirements are applicable for Direct Loan from June 2018 and Forward.		
050	R	Award, Disbursement	Disbursement Date Outside Allowable Window	A change to the Financial Award Begin Date and/or Financial Award End Date that results in a disbursement (actual or anticipated), greater than \$0, falling more than 180 days after the Financial Award End Date or more than 10 days before the Financial Award Begin Date. Disbursement date is more than 180 days after the Financial Award (Loan Period) End Date Disbursement date is more than 10 days prior to the Financial Award (Loan Period) Begin Date. NOTE: This edit will not be triggered if the disbursement amount is equal to zero. NOTE: If any disbursements associated to an award have been set with the Coronavirus Indicator, the COD System shall bypass Edit 050 for all disbursements for that award.	Direct Loan	Review your award dates and your disbursement dates. If incorrect, update and resubmit.
051	R	Disbursement	Disbursement Date With Disbursement Release Indicator Set to True Outside of Allowable Window	Disbursement Release Indicator is True and Disbursement Date is outside of allowable window. Allowable Window: Advanced Pay = 7 calendar days Reimbursement = 0 calendar days Heightened Cash Monitoring1 = 7 calendar days Heightened Cash Monitoring2 = 0 calendar days	Pell Grant TEACH Grant Direct Loan	Review your Disbursement Release Indicator Flag and submit a release based on the disbursement date and your school's allowable disbursement window.
053	R	Disbursement	Disbursement Date Cannot Be Blank	The Disbursement Date is not populated.	Pell Grant TEACH Grant Direct Loan	Resubmit disbursement with a disbursement date.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
054	W	Disbursement	Disbursement Date Within 7 Days or Passed, Disbursement Release Indicator Set To "False"	A record has been submitted with the Disbursement Release Indicator flag set to "False" AND the Disbursement Date is within the 7 calendar day window or has passed.	Pell Grant TEACH Grant Direct Loan	Review record to determine if a Disbursement Release Indicator flag of "True" is appropriate. This record will not be considered an actual disbursement until a Disbursement Release Indicator flag of "True" is received. If you intended this to be an actual disbursement, update the Disbursement Release Indicator flag and resubmit
055	W	Disbursement	Disbursement Information Received 30 Days after Date of Disbursement	Disbursement Information (DRI = true and Disbursement Sequence Number = 01) was received and processed by COD more than 30 days later than the Disbursement Date reported on the record. NOTE: While Warning Edit 055 looks at actual disbursement records submitted more than 30 days after the actual Date of Disbursement, regulations require schools to submit all actual disbursements to the Department within 15 days of the actual disbursement date. The IASG program is applicable in COD for the 2017-18 through 2023-24 Award Year.	Pell Grant TEACH Grant Direct Loan IASG	Review your internal processes to ensure your school is meeting all disbursement reporting requirements. Please refer to The Code of Federal Regulation 690.81 for more information regarding Pell. Please refer to The Code of Federal Regulation 685.301(e) for more information regarding DL. Please refer to The Code of Federal Regulation 686.37 for more information regarding TEACH.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
056	C/R	Disbursement	Sequence Number Not In Sequential Order	For actual disbursements (DRI=true): Disbursement Sequence numbers associated with a specific Disbursement Number must be processed in incremental, sequential order. (i.e. 1, 2, 3...) School reported a disbursement sequence number other than '1' on a disbursement that is not yet accepted. Sequence Number on accepted disbursement is not one higher than the last previously accepted transaction for this disbursement number. For Pell anticipated disbursements (DRI=false): If a sequence number other than "1" is submitted, COD will correct the sequence number to "1" and record will be accepted with correction.	Pell Grant TEACH Grant Direct Loan	Review disbursement transactions and disbursement sequence numbers for this disbursement and resubmit all transactions not yet accepted by COD in the proper order.
058	R	Disbursement	Duplicate Disbursement Information On File	The reported Disbursement Number, Sequence Number, and Disbursement Release Indicator equal to True are already on file with COD.	Pell Grant TEACH Grant Direct Loan	No action is required. If you are attempting to make a change, resubmit with a higher sequence number.
060	R	Disbursement	Insufficient Number of Disbursements Based on School Type	Disbursement Amount equals the Total Net Loan Amount and the school does not meet special condition status. Special condition status includes: Schools with a cohort default rate of <5% for the most recent year for which we have data may make a single disbursement on loans used for study abroad programs. Schools with a cohort default rate of <15% for each of the most recent three years for which we have data may make a single disbursement on single term loans. A minimum of two disbursements is required for all other schools. If a school loses single disbursement eligibility they have a 15 day window to submit disbursements.	Direct Loan	Since your school does not meet the cohort default rate requirements to make a single disbursement, you must disburse a loan in two or more disbursements and no single disbursement amount (net disbursement) can equal the total net loan amount. Update the disbursement amount for this record and resubmit.



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
061	R	Disbursement	Only One Disbursement Allowed for Students with a Verification Status of "W"	You can only make one disbursement for a student with a Verification Status of "W".	Pell Grant	You must perform verification on this student's application data. Once verification has been performed, update the verification status to "V" and resubmit.
062	R	Disbursement	Disbursement Amount(s) Is Less Than Or Equal to Zero for Disbursement Sequence Number 1	Disbursement Amount(s) is not populated, or zero, or less than zero for Sequence Number "1" and Disbursement Release Indicator is "true".	Pell Grant TEACH Grant Direct Loan	Resubmit disbursement sequence number 1 with a disbursement amount greater than zero.
063	R	Disbursement	Incorrect Net Disbursement Amount	<p>Disbursement Amount(s) is not equal to COD's calculated amount.: The Net Disbursement Amount is calculated using the following steps (+ or -\$1 tolerance):</p> <p>Step 1: Calculate the Combined Fee/Interest Rebate Percentage by subtracting the Interest Rebate Percentage from the Loan Fee Percentage</p> <p>Step 2: Calculate the Combined Fee/Interest Rebate Amount by multiplying the Disbursement Gross Amount by the Combined Fee/Interest Rebate Percentage (go out 3 decimal places) and truncating the result</p> <p>Step 3: Calculate the Net Disbursement Amount by subtracting the Combined Fee/Interest Rebate Amount from the Disbursement Gross Amount</p> <p>Step 4: Calculate the Loan Fee Amount by multiplying the Gross Disbursement Amount by the Loan Fee Percentage (go out 3 decimal places) and truncating the result</p> <p>Step 5: Calculate the Interest Rebate Amount by subtracting the Loan Fee Amount from the Gross Disbursement Amount and then subtracting the result from the Net Disbursement Amount</p> <p>Disbursement Release Indicator set to "Y" and Disbursement Amount exceeds annual loan limit across schools. See common record for loan limit criteria.</p> <p>NOTE: + or - \$1 tolerance only applies if there is no impact to Interest Rebate Amount</p> <p>NOTE: The COD System will reject a disbursement and return Edit 063 if the Net Disbursement Amount reported by the school is incorrect given</p>	Direct Loan	Verify your disbursement calculations based on the award type. Resubmit if appropriate.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				the accepted Origination Fee Percent		
064	C/R	Disbursement	Disbursement Amount > 50% of award with a Verification Status of "W"	ALL of the following are true: The Verification Status is 'W' on the Award AND Disbursement Amount is >50% of the Scheduled Award Amount If the school has chosen to have COD correct its records, COD will set the Accepted Disbursement Amount to the lesser of either the Award Amount or 50% of the Schedule Award Amount	Pell Grant	Review disbursement amount and verification status or assumption made. If incorrect, update and resubmit.
065	W	Disbursement	Insufficient Decrease in the Disbursement amount. Disbursement is expected for Amount of the Negative Pending	For Pell and Iraq and Afghanistan Service Grant: The Award has an "Over Paid" status and the school has sent a downward Disbursement Amount adjustment for an amount less than the Negative Pending Disbursement Amount. If the Additional Eligibility Indicator = "false" or not submitted and the TEU is still greater than (100% + Sum of Disaster Relief adjustments, Closed School Restoration adjustments, and Restoration for Discharge Adjustments received in the Award Year  ) OR if the Additional Eligibility Indicator = "true" and the TEU is still greater than (150% + Sum of Disaster Relief adjustments, Closed School Restoration adjustments, and <b>Restoration for Discharge Adjustments</b> received in the Award Year  ). NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant IASG	No action required.
066	R	Disbursement	Award is in "Overpaid" status. Disbursement Increase cannot be accepted	If ALL of the following are true: Award is in "Overpaid" Status A Disbursement Amount that would increase the sum of the accepted Disbursements to an Amount greater than the 'Award Amount' is submitted NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant IASG	—
067	C/R	Disbursement	Incorrect Disbursement Amount	For Direct Loan/TEACH: Sum of all the Disbursement Amounts exceeds the Award Amount. For Pell and Iraq and Afghanistan Service Grant: The sum of the disbursements exceeds the Award Amount. NOTE: Edit 067 will no longer be returned for Direct Loan and TEACH after June 2018 and will be replaced with a new award level Edit 222. Please see Edit 222 for further details. The existing correcting and rejecting Edit 067 will remain in effect and unchanged for Pell and IASG programs. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant Direct Loan TEACH Grant IASG	Review the disbursement amount for each disbursement number and compare to the award amount (Loan Amount Approved). Update record where appropriate and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
068	W	Disbursement	Potential Overaward Process- Notice Sent Separately	<p>For Pell: Pell disbursements for a student have been received from two or more schools and ALL of the following are true:  Disbursement is not rejected  Other Pell awards exist for the student at different Attended School Entity IDs for the current award year  Total amount disbursed for any of the other Pell awards is greater than zero If the Additional Eligibility Indicator = "false" or not submitted and the TEU is still greater than (100% +  Sum of Disaster Relief adjustments, Closed School Restoration adjustments, and <b>Restoration for Discharge adjustments</b> received in the Award Year ) OR if the Additional Eligibility Indicator = "true" and the TEU is still greater than (150% +  Sum of Disaster Relief adjustments, Closed School Restoration adjustments, and <b>Restoration for Discharge adjustments</b> received in the Award Year )</p> <p>For Iraq and Afghanistan Service Grant: Student has two or more Iraq and Afghanistan Service Grants in the same award year and ALL of the following are true:  Disbursement is not rejected  Other Iraq and Afghanistan Service Grant awards for the student at different Attended School Entity IDs for the current award year  Total amount disbursed for any of the other Iraq and Afghanistan Service Grant awards is greater than zero  If the Additional Eligibility Indicator = "false" or not submitted and the TEU is still greater than (100% - sequester-required reduction percentage for that Award Year) OR if the Additional Eligibility Indicator = "true" and the TEU is still greater than (150% - sequester-required reduction percentage for that Award Year)  NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.</p>	Pell Grant IASG	Review guidance contained in separate notice.
069	W	Disbursement	Potential Concurrent Enrollment – Notice Sent Separately	<p>Two or more Pell, TEACH and Iraq and Afghanistan Service Grant disbursements for a student have been received from two or more schools and ALL of the following are true:  Other Pell Grant/TEACH Grant/Iraq and Afghanistan Service Grant awards exist for the student at different Attended School Entity IDs for the current award year  Total amount disbursed for the student for any of the other Pell Grant/TEACH Grant/Iraq and Afghanistan Service Grant awards is greater than zero Enrollment Dates for the student are within 30 days of</p>	Pell Grant TEACH Grant IASG	Review guidance contained in separate notice.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				one another NOTE: Concurrent Enrollment is dependent on award type. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.		
070	W	Disbursement	Disbursement Release Indicator is Blank	Data in the disbursement block has been received but the Disbursement Release Indicator is not populated.	Pell Grant TEACH Grant Direct Loan	When the Disbursement Release Indicator is blank, COD records the Disbursement Release Indicator as "F." If the Disbursement Release Indicator should be "F", no further action is necessary. If you want this record to be considered an actual disbursement, update the Disbursement Release Indicator flag to "T" and resubmit.
071	R	Disbursement	New Disbursement (DRI = True) or Disbursement Increase Received Prior To Start of Processing Year or After the School Confirmed Closed Out or After End Of Processing Year Without Reopen/Extended Processing	For Direct Loan, TEACH, Pell, and Iraq and Afghanistan Service Grant (IASG): COD System returns Edit 071 when: A new disbursement (DRI = "True") is submitted prior to the beginning of the processing year OR A new disbursement or disbursement increase is submitted after the school has closed out the program/award year (school or FSA confirmed) and the school has not been reopened OR A new disbursement or disbursement increase is submitted after the data submission (closeout) deadline for the program/award year, and the school has not been granted Extended Processing.  The COD System does NOT return Edit 071 when: A decrease or non-financial* change to the disbursement is submitted after the school has closed out the program/award year (school or FSA confirmed) and the school has not been reopened OR A decrease or non-financial* change to the disbursement is submitted	Pell Grant IASG TEACH Grant Direct Loan	For records submitted prior to the beginning of the processing year, these records should be resubmitted within the eligible date range.  For records submitted after your school has closed out or after the data submission (closeout) deadline, review your records.  If you need to submit decreases to the disbursement amount or non- financial changes, extended processing is not

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				<p>after the data submission (closeout) deadline for the program/award year, and the school has not been granted Extended Processing OR</p> <p>For a Pell Grant, when the student is in POP status</p> <p>*Non-financial changes are defined as any disbursement-level maintenance except new disbursements (DRI="True") or changes to Disbursement Amounts. Examples of non-financial changes: Coronavirus Indicator, Disbursement Date, School Enrollment Code, Enrollment Status, <b>Enrollment Intensity Percentage</b>, etc.</p> <p>NOTE: The IASG program is applicable in COD for the 2017-18 through 2023-24 Award Year. Reopen/extended processing for IASG must be requested under the Pell program. If authorized, reopen/extended processing will apply to both programs for that award year.</p>		<p>required. Make any corrections and resubmit only the decrease or non-financial change to COD.</p> <p>If you need to submit new or increased disbursement amounts, you must request and be approved for an extension to the data submission deadline. Fill out the request form on the Request Reopen/Extended Processing page on the COD website. Requests will be reviewed on a case-by-case basis and must meet applicable regulatory requirements.</p>
072	R	Disbursement	Incomplete Disbursement Amounts	Sequence Number is "2" or greater missing Gross Disbursement Amount, OR Disbursement Fee Amount OR Interest Rebate Amount OR Disbursement Net Amount.	Direct Loan	Resubmit record with all disbursement amounts populated.
073	R	Disbursement	Insufficient information with Disbursement Release Indicator set to "True"	Record submitted with Disbursement Release Indicator flag set to "True" has insufficient data on file. See Common Record Layout for fields required prior to setting the Disbursement Release Indicator to "True".	Pell Grant TEACH Grant Direct Loan	Review the record in conjunction with the Technical Reference Volume 2, Section 3: Common Record Layout. Resubmit with all required data elements populated.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
074	R	Disbursement	Incorrect Adjustment to Disbursement Release Indicator	Disbursement Release Indicator adjusted to "False" after disbursement was funded. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant TEACH Grant Direct Loan IASG	No action required. Disbursement Release Indicator cannot be changed to "False" after disbursement becomes an actual disbursement. If you are attempting to cancel a disbursement, then you must send an adjustment to the disbursement amount.
075	R	Disbursement	Multiple First Disbursement Flags	More than one disbursement was submitted to COD with a First Disbursement Flag of "True" for this loan in the same cycle. NOTE: Not applicable for Award Years 2011-12 and forward	Direct Loan	Review disbursements and resubmit record with only one disbursement flagged as the first disbursement.
077	R	Disbursement	Incorrect Disbursement Loan Fee Amount	Disbursement Fee Amount does not equal COD's calculated Loan Fee Amount. NOTE: The COD System will reject a disbursement and return Edit 077 if the Disbursement Loan Fee Amount reported by the school is incorrect given the accepted Origination Fee Percent	Direct Loan	Review Disbursement Loan Fee Amount calculation. Resubmit record with corrected disbursement amounts
078	R	Disbursement	Incorrect Disbursement Rebate Amount	Up-Front Interest Rebate Amount does not equal COD's calculated Up-Front Interest Rebate Amount. NOTE: The COD System will reject a disbursement and return Edit 078 if the Interest Rebate Amount reported by the school is incorrect given the accepted Origination Fee Percent	Direct Loan	Review Disbursement Loan Fee Amount calculation. Resubmit record with corrected disbursement amounts.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
079	R	Disbursement	Payment Period Start Date Not In Eligible Range	The school is ineligible and the Payment Period Start Date does not fall within the range of eligibility. For 2024-25 Award Year, valid date range is 2023-10-01 to 2025-06-30.	Pell Grant TEACH Grant	Review the Payment Period Start Date reported. If incorrect, update and resubmit. If correct, you are not eligible to receive Pell Grant funds for this student. No further action required.
080	R	Disbursement	No Accepted PLUS Credit Decision Status	The Disbursement Release Indicator is set to "True" and there is no approved PLUS Credit Decision Status on file for this loan. An approved PLUS Credit Decision Status must be obtained for a PLUS borrower prior to disbursement.	Direct PLUS Loan	Resubmit Disbursement Release Indicator of "True" after an approved credit decision is obtained for this PLUS borrower.
081	R	Disbursement	No Promissory Note on File	The Disbursement Release Indicator is set to "True" and there is no MPN on file for this loan, and the school is required to have an MPN on file at COD prior to disbursements.	Direct Loan	Resubmit disbursement with Disbursement Release Indicator of "true" after you receive a response record indicating that an accepted MPN is on file at COD for this loan.
083	R	Disbursement	Program Compliance Rejected This Student For Eligibility Issues	Program Compliance rejected this student for eligibility issues	Pell Grant TEACH Grant Direct Loan	Contact your payment analyst (formerly referred to as reimbursement analyst) for additional information about correcting this record.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
084	R	Disbursement	Program Compliance Rejected This Student For Incorrect Calculation(s)	Program Compliance rejected this student for incorrect calculation(s)	Pell Grant TEACH Grant Direct Loan	Contact your payment analyst (formerly referred as reimbursement analyst) for additional information about correcting this record.
085	R	Disbursement	Program Compliance Rejected This Student For Already Being Funded	Program Compliance rejected this student for already being funded	Pell Grant TEACH Grant Direct Loan	Contact your payment analyst (formerly referred as reimbursement analyst) for additional information about correcting this record.
086	R	Disbursement	Program Compliance Rejected This Student For Improper Package Submission	Program Compliance rejected this student for improper package submission	Pell Grant TEACH Grant Direct Loan	Contact your payment analyst (formerly referred as reimbursement analyst) for additional information about correcting this record.
087	R	Disbursement	Program Compliance Rejected This Student For Incomplete Student Processing	Program Compliance rejected this student for incomplete student processing	Pell Grant TEACH Grant Direct Loan	Contact your payment analyst (formerly referred as reimbursement analyst) for additional information about correcting this record.
088	R	Disbursement	Program Compliance Rejected This Student For Missing Documentation	Program Compliance rejected this student for missing documentation information	Pell Grant TEACH Grant Direct Loan	Contact your payment analyst (formerly referred as reimbursement analyst) for additional information about correcting this record.



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
089	R	Disbursement	Invalid disbursement due to pending bankruptcy	Invalid disbursement transaction. The disbursement is received after the receipt of a pending bankruptcy notification. NOTE: Not applicable for 2004-05 and forward.	Direct Loan	No further disbursements or upward adjustments to existing disbursements can be made on this loan. Downward adjustments on this specific loan can be accepted.
090	W	Entity	Reported Amount of Disbursements does not equal Amount of detail records	The Total Reported Amount of Disbursements in the Entity Block does not equal the amount (sum of disbursements) of detail records for the Program for the award year.	Pell Grant TEACH Grant Direct Loan	Compare the sum of individual disbursement amounts to the Total Amount Reported. Update if appropriate and resubmit.
092	R	Award	No further awards can be accepted for this borrower, person is deceased	No further awards can be accepted for this borrower. The Servicer has notified COD that this person is deceased.	TEACH Grant Direct Loan	Award cannot be accepted as the borrower is deceased. Verify this award has the correct last name, SSN, and birth date.
093	R	Disbursement	Invalid disbursement Sequence Number	Invalid disbursement Sequence Number. Disbursement sequence number must be 1-65	Pell Grant TEACH Grant Direct Loan	Verify disbursement sequence number and resubmit.
094	R	Disbursement	Invalid disbursement due to a loan discharge notification for an unauthorized signature/unauthorized payment or False Certification Identity Theft.	Invalid disbursement transaction. The disbursement is received after the receipt of a loan discharge notification due to an unauthorized signature/unauthorized payment or False Certification Identity Theft.	TEACH Grant Direct Loan	No further disbursements or upward adjustments to existing disbursements can be made on this loan. Downward adjustments on this specific loan can be accepted.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
095	R	Disbursement	Invalid disbursement, person is deceased	Invalid disbursement transaction. The disbursement is received after the receipt of a loan discharge notification due to death of the borrower.	TEACH Grant Direct Loan	No further disbursements or upward adjustments to existing disbursements can be made on this loan. Downward adjustments on this specific loan can be accepted.
097	R	Disbursement	Disbursement amount would have been corrected to zero by COD calculations so the record was rejected	A Pell Disbursement record triggered edit 067, Incorrect Disbursement Amount, and the school's Error Processing Option has been set for COD to correct Pell data; however, based on COD calculations, the Disbursement Amount would have been corrected to \$0.00. Therefore, the disbursement record is rejected.	Pell Grant	Review disbursement amount and resubmit disbursement record.
099	W	Disbursement	This disbursement is flagged for Coronavirus. No further maintenance will be allowed for this disbursement	Returned on <DisasterApplies> when the Coronavirus Indicator is set to 'true'.	Pell Grant TEACH Grant Direct Loan IASG	No Action Required
		Award	One or more disbursement( s) for an award are flagged for Coronavirus.	Returned on <FinancialAwardBeginDate> when Coronavirus Indicator is set to true; the Loan Begin Date was adjusted when calculating the subsidized usage on Direct Loan. Returned on <FinancialAwardEndDate> when Coronavirus Indicator is set to true; the Loan End Date was adjusted when calculating the subsidized usage on Direct Loan.	Direct Loan	
100	R	Award	Sender does not have reporting permission for the School identified in the Reporting School Entity ID.	Destination Mailbox Number ID (TG Number) does not have reporting permission for the School identified in the Reporting School Entity ID.	Pell Grant TEACH Grant Direct Loan	Verify your School Entity ID.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
101	W	Award	The Reporting School Entity ID is listed as ineligible upon receipt of batch	Reporting School is currently listed as ineligible on file with COD.	Pell Grant TEACH Grant Direct Loan	No Action Required.
102	W	Entity	Reported Amount of Awards does not equal Amount of detail records	The Total Reported Award Amount in the Entity Block does not equal the amount (sum of Award Amount) of detail records for the Program for the award year.	Pell Grant TEACH Grant Direct Loan	Compare the sum of the individual Award Amounts to the Total Reported Award Amount. Update appropriately and resubmit.
105	R	Document	Only one document can be submitted per pair of SAIG Transmission Batch Headers and Trailers.	Either more than one set of Common Record root elements or other extraneous data were submitted within a set of SAIG Batch Headers and Trailers.	Pell Grant TEACH Grant Direct Loan	Review submission and resubmit with only one Common Record document between SAIG Transmission Batch Headers and Trailers.
113	R	Disbursement	Total Disbursed amount cannot be greater than the lesser of the Award Amount or the Endorser Amount	The sum of all disbursement amounts for a PLUS loan cannot exceed the lesser of the Award Amount or the Endorser Amount. NOTE: Applicable for Award Year 2003-04 and forward only	Direct PLUS Loan	Review the total disbursement amount for this PLUS loan in conjunction with the Endorser Amount. Update and resubmit disbursement.
115	W	Disbursement	Student referred to DMCS, satisfactory arrangements must be established with DMCS prior to making further disbursements	A new Pell Grant disbursement is submitted for a student who has been referred to DMCS for an overpayment status corresponding to the award type of the new disbursement without satisfactory arrangement; or an increase to an existing Pell Grant disbursement is submitted for a student who has been referred to DMCS for an overpayment status corresponding to the award type of the disbursement increase without satisfactory arrangement.	Pell Grant TEACH Grant	Action may be necessary. Contact the student to validate the status of the Pell Grant overpayment. If the student does not have the satisfactory arrangements established at DCS, the disbursement or disbursement increase cannot be made.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
116	W	Award	SSN, Date of Birth and/or Last Name have NOT been updated in the COD system	School submitted a change to a student identifier and either of the following is true: The award year submitted on the change record is lower than the highest award year for the student For the same award year, the <b>FPS</b> transaction number on the change record is either less than the highest transaction number for that award year and student, or is equal to the highest transaction number for that award year and student and the identifier data does match with <b>FPS</b> .	Pell Grant TEACH Grant Direct Loan	No action required. Record has processed, but student identifier has not been updated in COD system
117	R	Award	Disbursement information is incomplete or rejected. Direct Loan award is not accepted.	Initial Direct Loan award is submitted and ANY of the following is true: Sum of disbursements (Disbursement Release Indicator = false and/or true) does not equal award amount one or more of the disbursements rejects School is not eligible for a single disbursement and submits a single disbursement School is eligible for a single disbursement and submits a single disbursement not equal to the award amount If the sum of the disbursements is equal to the award amount check to see if one or more of the disbursements rejected. NOTE: Applicable for Award Year 2004-2005 and forward only.	Direct Loan	Review the sum of disbursement amounts. Confirm that sum of disbursement amounts are equal to award amount. Update and resubmit award.
118	W	Award	The sum of anticipated disbursements does not equal the updated Direct Loan award amount. COD will recalculate the anticipated disbursement.	The sum of the reported anticipated disbursements does not equal the updated Direct Loan Award Amount. Therefore, COD recalculated the anticipated disbursements first reducing the last anticipated disbursement (largest disbursement number) and then reducing each of the previous disbursements as needed until the sum of the anticipated disbursements equals the new award amount. NOTE: Applicable for Award Year 2004-2005 and forward only.	Direct Loan	No action required.
119	W	Award	COD has reduced the anticipated disbursements and made this loan inactive based upon your record reducing the Award Amount to \$0.	School submitted a change to a Direct Loan award reducing the Award Amount to \$0 and the sum of anticipated disbursements on file is greater than \$0. COD reduced anticipated disbursements to \$0. Loan is inactive.  NOTE: Applicable for Award Year 2004-2005 and forward only.	Direct Loan	No action required.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
120	W	Person	Incomplete Address: Complete Address Exists on COD. For Direct PLUS Loan Only, Student Address is Incomplete.	A complete address is defined as when at least one occurrence of each of the following is be present: AddressLine City StateProvinceCode PostalCode CountryCode (only required for foreign addresses) For Pell and Direct Loan (Subsidized and Unsubsidized): The student's address is incomplete on the incoming record; however a complete address is found on <b>FPS</b> or the COD database. For Direct PLUS Loan: The student's address is incomplete on the incoming record, the COD database or the <b>FPS</b> .	Pell Grant TEACH Grant Direct Loan	No action required. Schools may check the address COD has for a student on the COD web site. Schools can update the address on the COD web site or can submit an updated address via batch.
121	R	Person	SSN Change Request Rejected as person is also a PLUS Borrower.	Edit 121 will be returned when an SSN Change is submitted (for any award type) for a PLUS borrower with the following conditions: The award amount is greater than zero, and The sum of all actual disbursements for PLUS loans does not equal the PLUS award amount (i.e. the award is not fully disbursed). NOTE: An award must be fully disbursed for 24 hours before an SSN change is submitted. An attempt to change the borrower's SSN on a PLUS award that has been fully disbursed for less than 24 hours will result in Edit 121 being returned.	Pell Grant TEACH Grant Direct PLUS Loan	Cancel the loan/grant and reoriginate with the correct SSN.
122	R	Person	Increase to PLUS Loan Award Amount Rejected.	Edit 122 will be returned when a school submits an increase to a PLUS loan award amount and the person has had an SSN change. NOTE: Applicable for all award years.	Direct PLUS Loan	Cancel the loan and reoriginate with the correct SSN.
131	W	Disbursement	The same CIP code was submitted more than once for the same disbursement.	An origination or change record is submitted with multiple of the same CIP code on the same disbursement record. This applies for Award Year 2024-25 and forward. For Award Year 2025-26 and forward, this edit will be returned on the <CIP> tag instead of the <ProgramCIPCode> tag.	Pell Grant TEACH Grant Direct Loan	No action required. The COD System will only save the duplicate CIP Code once. Schools may check the CIP codes COD has for a student on the COD web site. Schools can update the CIP codes on the COD web site or can submit updated CIP codes via batch.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
138	R	Award	Incorrect PreProfessional CourseWork Indicator	Grade Level does not equal 5 with the PreProfessionalCourseworkIndicator set to true. PreProfessionalCourseworkIndicator flag set to true with submitted Grade Level not equal to 5.	Direct Loan	Verify student Grade Level. If Grade Level is not equal to 5, then PreProfessional Coursework Indicator cannot be true. Update record as appropriate and resubmit.
139	R	Award	Incorrect PreProfessional CourseWork Flag	Health Professions flag set to true when the PPCI flag is set to true or PPCI flag set to true when the Health Professions flag is set to true.	Direct Loan	Check record, change Health Professions flag to false. Keep PPCI flag set to true. Check record, change PPCI flag to false. Keep Health Professions flag set to true.
140	R	Award	Incorrect Origination Fee Percent and/or Interest Rebate Percent on Awards	The Origination Fee Percent/Interest Rebate Percent submitted is not valid for the period in which the Earliest Disbursement Date (EDD) falls and the Grade Level and Award Type submitted. Please note that the Origination Fee and Interest Rebate percentages described below apply to Sub and Unsub loans and PLUS Loans. Valid values per period for Sub/Unsub Loans are: Origination Fee Period EDD prior to 7/1/2007 – 3.0% EDD on or after 7/1/2007 and before 7/01/2008 2.5% EDD on or after 7/1/2008 and before 7/1/2009 – 2.0% EDD on or after 7/1/2009 and before 7/1/2010 – 1.5% EDD on or after 7/1/2010 and before 7/1/2013 – 1.0% EDD on or after 7/1/2013 and before 12/1/2013 – 1.051% EDD on or after 12/1/2013 and before 10/1/2014 – 1.072% EDD on or after 10/1/2014 and before 10/1/2015 – 1.073% EDD on or after 10/1/2015 and before 10/1/2016 – 1.068% EDD on or after 10/1/2016 and before 10/1/2017 – 1.069% EDD on or after 10/1/2017 and before 10/1/2018 – 1.066% EDD on or after 10/1/2018 and before 10/1/2019 – 1.062% EDD on or after 10/1/2019 and before 10/1/2020 – 1.059% EDD on or after 10/1/2020 and before 10/1/2024 – 1.057% Interest Rebate Period	Direct Loan	Verify the Origination Fee Percent and/or Interest Rebate Percent based on the Origination Fee Period and Interest Rebate Period in which the Earliest Disbursement Date falls. Update record as appropriate and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				EDD prior to 7/1/2009 – 1.5% EDD on or after 7/1/2009 and before 7/01/2010 – 1.0% EDD on or after 7/1/2010 and before 7/1/2012– 0.5% EDD on or after 7/1/2012 – 0% Valid values per period for PLUS Loans are: Origination Fee Period EDD on or after 1/3/2001 and before 7/1/2013– 4.0% EDD on or after 7/1/2013 and before 12/1/2013 – 4.204% EDD on or after 12/1/2013 and before 10/1/2014 – 4.288% EDD on or after 10/1/2014 and before 10/1/2015 – 4.292% EDD on or after 10/1/2015 and before 10/1/2016 – 4.272% EDD on or after 10/1/2016 and before 10/1/2017 – 4.276% EDD on or after 10/1/2017 and before 10/1/2018 – 4.264% EDD on or after 10/1/2018 and before 10/1/2019 – 4.248% EDD on or after 10/1/2019 and before 10/1/2020 - 4.236% EDD on or after 10/1/2020 and before 10/1/2024 - 4.228% Interest Rebate Period EDD on or after 1/3/2001 and before 7/1/2012 – 1.5% EDD on or after 7/1/2012– 0%		
141	R	Award	Cannot change the Origination Fee Percent and/or Interest Rebate Percent on an Active Loan	Attempt to change the Origination Fee Percent and/or Interest Rebate Percent of an Active Loan. NOTE: Loans first disbursed on or after 7/1/2012 will not be eligible for an upfront interest rebate	Direct Loan	Inactivate the loan first and submit the Origination Fee Percent or Interest Rebate Percent change on a separate change record. Update record as appropriate and resubmit.
145	R	Award	New Pell Origination or Award Increase with Verification Status of W or Invalid Change to Verification Status Submitted After Cut Off Date	A Pell origination is submitted with Verification Status equal to W after the Verification W cut-off date. NOTE: Only applicable for Award Year 2008-2009 and forward.	Pell Grant	Update Verification Status Code and resubmit origination.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
146	R	Disbursement	New disbursement or disbursement increase submitted after Verification W cut-off date	A Pell disbursement or disbursement increase is submitted with Verification Status equal to W after the Verification W cut-off date. NOTE: Only applicable for Award Year 2008-2009 and forward.	Pell Grant	Update Verification Status Code and resubmit disbursement or disbursement increase.
147	R	Person	Identifier inconsistency for PLUS Award for Graduate/Professional Student	A DL PLUS origination or change record for Graduate/Professional Student is submitted AND one of the following Student tags does not match the corresponding tag for the Borrower: Last Name (origination only) Date of Birth (origination only) Last Name change (maintenance only) Date of Birth change (maintenance only) SSN change (maintenance only)	Direct PLUS Loan	If submitting an origination or change record with matching Student and Borrower SSNs, verify all of the following tags match for the Student and Borrower: Last Name (origination only) Date of Birth (origination only) Last Name change (maintenance only) Date of Birth change (maintenance only) SSN change (maintenance only) In any event, update record as appropriate and resubmit.
148	W	Person	First Name inconsistency on PLUS Award for Graduate/Professional Student	An origination or change record for a DL PLUS loan for Graduate/Professional Student is received and the complete First Name in the Student First Name Tag and Borrower First Name Tag do not match	Direct PLUS Loan	Verify that: This is not a DL PLUS loan for Graduate/Professional Student (Student SSN does not match Borrower SSN), OR Complete Student First Name matches complete Borrower First Name Update record as appropriate and resubmit.



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
149	R	Person/Award	Identifier inconsistency for PLUS Award for Parent of a Dependent Undergraduate Student	<p>An origination or Change record is submitted that would result in the student Date of Birth equaling the borrower DOB on a DL PLUS award for Parent of a Dependent Undergraduate student (student SSN is not equal to the borrower SSN). This occurs when:</p> <p>The complete Student Date of Birth identifier tag and complete Borrower Date of Birth identifier tag match on Award Origination or Change record</p> <p>The complete Student Date of Birth change matches what is submitted in the Borrower Date of Birth identifier tag and no corresponding Borrower Date of Birth change tag is submitted on Award Origination</p> <p>The complete Student Date of Birth change matches what exists on the COD system for the Borrower and no Borrower Date of Birth change is submitted in Award Change Record</p> <p>The complete Student Date of Birth change tag and complete Borrower Date of Birth change tag match</p> <p>The complete Borrower Date of Birth change matches what is submitted in the Student Date of Birth identifier tag and no Student Date of Birth change is submitted on Award Origination</p> <p>The complete Borrower Date of Birth change matches what exists in the COD system for the Student and no Student Date of Birth change is submitted on Award Change Record</p>	Pell Grant TEACH Grant Direct Loan	Verify condition at left, update record as appropriate and resubmit.
150	R	Award	Incorrect Student Grade Level on a Direct PLUS Loan or Subsidized Award for Graduate/Professional Student	<p>An origination or change record for DL Subsidized awards for Graduate/Professional students is submitted with Grade Level 6 or 7 (Only applicable for awards with Award Begin Date on or after July 1, 2012)</p> <p>An origination or change record for DL PLUS award for Graduate/Professional students (student SSN is equal to the borrower SSN) is submitted with Grade Level &lt; 6.</p> <p>NOTE: Only applicable for Award Year 2008-2009 and forward. For Award Years 2007-2008 and prior, Edit 016 will be applied.</p>	Direct Subsidized Loan and PLUS	<p>If student SSN equals borrower SSN, then grade level must be greater than or equal to 6.</p> <p>Verify the Student and Borrower SSNs and Student Grade Level.</p> <p>Update record as appropriate and resubmit. If a DL subsidized award is submitted for a student with grade level 6 or 7</p> <p>Verify Award Begin Date and grade level for DL Subsidized award and if both are correct then the student is not eligible</p>

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
						for a DL Subsidized award
151	R	Person	Invalid Student/Borrower SSN combination on a Direct PLUS Loan Award for Graduate/Professional Student	An origination or change record for DL PLUS award for Graduate/Professional students (student SSN is equal to the borrower SSN) was submitted, AND an SSN change is submitted in the student block without a corresponding change in the borrower block. NOTE: Only applicable for Award Year 2008-2009 and forward. For Award Years 2007-2008 and prior, Edit 016 will be applied.	Direct PLUS Loan	If student SSN currently equals borrower SSN, then an SSN change may not be submitted in the student block without a corresponding change in the borrower block. Verify the SSN change in the student block is reflected in the borrower block, OR Verify that the student SSN is not inadvertently changed. Update record as appropriate and resubmit.
152	R	Person	Invalid Student SSN change on a Direct PLUS Loan Award for Parent of a Dependent Undergraduate Student	An origination or change record is submitted with a change to the student SSN that would result in the student SSN equaling the borrower SSN on a DL PLUS award for Parent of a Dependent Undergraduate Student (Student SSN and Borrower SSN are not currently equal). NOTE: Only applicable for Award Year 2008-2009 and forward for Pell, Direct Loan and TEACH. For Award Years 2007-2008 and prior, Edit 016 will be applied.	Pell Grant TEACH Grant Direct Loan	If student SSN is not equal to the borrower SSN on a DL PLUS for Parent of Dependent Undergraduate Student, a student SSN change may not be made on any award type that would result in the student SSN matching the borrower SSN on the DL PLUS award. Verify the student SSN change tag. Update record as appropriate and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
153	R	Person/Award	Invalid Borrower SSN change on a Direct PLUS Loan Award for Parent of a Dependent Undergraduate Student	An origination or change record is submitted with an SSN change that would result in the borrower SSN equaling the student SSN on a DL PLUS award for Parent of a Dependent Undergraduate Student (student SSN and borrower SSN are not currently equal). NOTE: Only applicable for Award Year 2008-2009 and forward for Pell, Direct Loan and TEACH. For Award Years 2007-2008 and prior, Edit 016 will be applied.	Pell Grant TEACH Grant Direct Loan	If borrower SSN is not equal to the student SSN on a DL PLUS award for Parent of Dependent Undergraduate Student, an SSN change may not be made on any award type that would result in the borrower SSN matching the student SSN on the DL PLUS award. Verify the borrower SSN change tag. Update record as appropriate and resubmit.
154	R	Award	Dependency Status set to D and Grade Level greater than or equal to 6	An origination or change record is submitted causing Dependency Status Code to equal D and Student Grade Level to be greater than or equal to 6.	Direct Loan	Verify the Dependency Status Code and Student Grade Level in the record as well as the values currently stored on the COD system. Update record so that either Dependency Status Code = I at any Student Grade Level, OR Dependency Status Code = D with Student Grade Level < 6 and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
156	R	Award	Dependency Status set to I and Additional Unsubsidized Indicator set to true	An origination or change record is submitted causing Additional Unsubsidized Indicator to equal true and Dependency Status Code to equal I.	Direct Loan	Verify the Additional Unsubsidized Indicator and Dependency Status Code in the record as well as the values currently stored on the COD system. Update records so that either Additional Unsubsidized Indicator = false and Dependency Status Code = I or D, OR Additional Unsubsidized Indicator = true and Dependency Status Code = D and resubmit.
157	R	Award	Sum of Award Amounts exceeds Base Annual Loan Limit	An award is submitted for a dependent undergraduate student causing the sum of award amounts for unsubsidized loans and subsidized loans to exceed the Base Annual Loan Limit AND the student is not receiving/not eligible for Additional Unsubsidized Loans.	Direct Loan	Refer to Business Rules concerning Additional Unsubsidized Loan eligibility in Volume 2, Section 1 – Implementation Guide. Verify award amount and Additional Unsubsidized Loan eligibility and resubmit.
158	R	Award	HPPA Indicator set to true and Grade Level less than 6	An award is submitted causing Health Professions flag to equal true and Student Grade Level to be less than 6	Direct Loan	Verify the Health Professions flag value in the record as well as the values currently stored on the COD system. Update records so that either Health Professions flag = true OR Student Grade Level >= 6 and

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
						resubmit.
159	R	Award	Incorrect Student Grade Level on a Direct PLUS Loan Award for Parent of a Dependent Undergraduate Student	An origination or change record for DL PLUS award for Parent of a Dependent Undergraduate Student (student SSN is not equal to the borrower SSN) is submitted with Grade Level > 5. NOTE: Only applicable for Award Year 2008-2009 and forward.	Direct PLUS Loan	If student SSN does not equal borrower SSN, then grade level must be less than or equal to 5. Verify the Student and Borrower SSNs and Student Grade Level. Update record as appropriate and resubmit.
160	R	Award	Disbursement information is incomplete or rejected, TEACH award is not accepted	Performed on new TEACH awards only: Initial TEACH award is submitted and ANY of the following are true: Sum of disbursements (DRI = false and/or true) does not equal the award amount One or more of the disbursements rejects	TEACH Grant	Verify the sum of disbursements equals the award amount, and that all disbursements are accepted with no reject edits. If appropriate, update record and resubmit.
161	R	Award	Attended School is TEACH Ineligible	School is not eligible to submit a new TEACH origination because the school is not eligible to participate in the Title IV programs.	TEACH Grant	Review your Attended School Entity Identifier to ensure it is correct and that you are eligible to participate in the program for which you are submitting records and/or requesting funds. If incorrect, update record and resubmit.
162	R	Award	Incorrect Award Amount for TEACH	The Award amount originated exceeds the maximum award amount for a single TEACH award. Max Award Amt = \$4000.00	TEACH Grant	Review the maximum limit for this award. If appropriate, update this field and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
163	R	Award	Award Amount exceeds the Maximum TEACH Grant Amount for an Award Year	Sum of Award amounts across all awards, all schools, and all grade levels exceed the maximum Award amount for an award year. Max Award Amt = \$8000.00	TEACH Grant	Correct the award amount and resubmit with a valid award amount.
164	R	Award	Invalid Teacher Expert Flag	Teacher Expert Indicator flag set to "true" with the Grade Level not equal to 6 or 7.	TEACH Grant	Verify the Teacher Expert Indicator flag value in the record as well as the values currently stored on the COD system. Update records so that either Teacher Expert Indicator flag = false OR Student Grade Level >= 6 and resubmit.
165	R	Disbursement	No Agreement on File	The Disbursement Release Indicator is set to "true" and there is no active Agreement To Serve or Repay on file for this grant.	TEACH Grant	If the Disbursement Release Indicator is "true" on any of the disbursements, verify an active, accepted Agreement to Serve or Repay exists on the COD System associated with the TEACH Grant. If appropriate, update record and resubmit.
166	R	Award	Attended School is not a main location	School is not eligible for TEACH activity because the attended school's OPEID is not identified as a main location.	TEACH Grant	If attended school is a main location, verify the school's OPEID. If appropriate, update record and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
167	R	Award	Sum of Subsidized Awards exceeds the Subsidized Loan Limit	A Subsidized award is submitted that causes the sum of award amounts for all Subsidized loans to exceed the Subsidized Loan Limit	Direct Loan	Review the maximum annual loan limit for this award. Also, review all sub awards for this student. Verify total Subsidized award amount and loan eligibility and resubmit.
168	W	Person	Post 9-11 Deceased Veteran Dependent Indicator is marked as "true" on the COD system	The post 9/11 Deceased Veteran Dependent Indicator is marked as "true" and the student received award or disbursement activity. *Applies only to Award Year 2009-2010 <b>through 2023-24</b> .	Pell Grant	No action required.
172	C/R	Award	Incorrect Award Amount when Additional Eligibility Indicator is "true"	<p>Award amount exceeds 1.5 times the student's Scheduled Federal Pell Grant, or for Iraq and Afghanistan Service Grant applicable AYs, the Sequester- Limited Scheduled Award, and the Additional Eligibility Indicator = "true".</p> <p>OR</p> <p>The Award Amount is greater than 1.5* the Scheduled Federal Pell Grant +  Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) at the school in the award year </p> <p>Refer to the Federal Student Aid Handbook for maximum annual limits. Edit 172 will be returned if all of the following is true:</p> <p>The Pell or Iraq and Afghanistan Service Grant award is submitted with, or already contains, an AEI equal to "true"</p> <p>The Award Amount submitted is greater than (1.5 times the Scheduled Federal Pell Grant) or for Iraq and Afghanistan Service Grant applicable AYs, the Sequester-Limited Scheduled Award. Refer to Volume 2, Section 1 for more information on the Sequester-Limited Scheduled Award.</p> <p>NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.</p>	Pell Grant IASG	Review the maximum annual limit for the award. If necessary, update the award amount and resubmit the record.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
173	C/R	Award	Additional Eligibility Indicator changed to “false” and Award Amount exceeds the maximum limit	<p>The Additional Eligibility Indicator was changed from “true” to “false” and the Award Amount was greater than the student’s Scheduled Federal Pell Grant, or for Iraq and Afghanistan Service Grant applicable AYs, the Sequester- Limited Scheduled Award.</p> <p>OR</p> <p>The Additional Eligibility Indicator was changed from “true” to “false”, there is a Disaster Relief LEU Adjustment for the school in the award year, and the Award Amount was greater than the student’s Scheduled Federal Pell Grant  +  Sum of disbursements represented by the student's Disaster Relief LEU Adjustment (including Coronavirus Disaster Relief) at the school in the award year </p> <p>Refer to the Scheduled Federal Student Aid Handbook for maximum annual limits.</p> <p>NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.</p>	Pell Grant IASG	Review the maximum annual limit for this award. Update the award amount and resubmit. For Correcting Schools, no action required.
174	W	Award	Additional Eligibility Indicator changed to “false” and the award is now in “Overpaid” status	<p>The Additional Eligibility Indicator was changed from “true” to “false” and the Award Amount was reduced to an amount lower than the total funded disbursement amount of that award.</p> <p>NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.</p>	Pell Grant IASG	No action required.
175	W	Award	Additional Eligibility Indicator changed to “false” and the Percentage of Total Eligibility Used exceeds 100% at all schools for Pell in that award year. Potential Overaward Project applies.	<p>This edit will trigger when an AEI changes from “true” to “false” and the total disbursement amount at two or more schools is greater than the Scheduled Award, or for Iraq and Afghanistan Service Grant applicable AYs, the Sequester-Limited Scheduled Award. POP rules apply and the student may be in POP status.</p> <p>ALL of the following must be true for the edit to trigger:</p> <p>AEI is changed from “true” to “false”</p> <p>The AEI is “false” at all schools where the EU is greater than 0% for the same award year For Pell</p> <p>The student has a Pell award at another school for the same award year</p> <p>Percentage of Total Eligibility Used is greater than 100%</p> <p>For Iraq and Afghanistan Service Grant</p> <p>The student has an Iraq and Afghanistan Service Grant award at another school for the same award year</p> <p>Percentage of Total Eligibility Used is greater than allowed sequester reduced limit</p>	Pell Grant IASG	No action required.



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.		
176	C/R	Disbursement	Percentage of Total Eligibility Used exceeds 200% when the Additional Eligibility Indicator is set to "true" for one or more schools in the award year.	The Additional Eligibility Indicator is "true" and the percentage of Total Eligibility Used for the award year at all schools is greater than 200%. Refer to the Federal Student Aid Handbook for maximum annual limits. NOTE: Only applicable for Award Years 2009-10 and 2010-11	Pell Grant	Correct the disbursement amount and resubmit with a valid disbursement amount. For Correcting Schools, no action required.
177	W	Award	Lifetime Percentage of Eligibility Used is near the lifetime limit	For Pell: A student's Lifetime Eligibility Used is within 450% and 600%. NOTE: Prior to July 2012, the condition of this edit was within 750% and 900%. For Iraq and Afghanistan Service Grant: The student's Iraq and Afghanistan Service Grant LEU is within 450.000% and 600.000%. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant IASG	No action required.
178	W	Award	Lifetime Percentage of Eligibility Used has exceeded the lifetime limit	A student's Lifetime Eligibility Used has exceeded 600%. NOTE: Prior to July 2012, the condition of this edit was 900%. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant IASG	Review the students Pell Grant/Iraq and Afghanistan Service Grant history, and make the necessary adjustments to bring the student's Pell/ Iraq and Afghanistan Service Grant LEU to 600% or less.
180	R	Disbursement	Disbursement Release Indicator Set to "True" for PLUS award with PLUS Credit Decision Status Pending/Declined	The Disbursement Release Indicator is set to "True" and there is no approved PLUS Credit Decision Status on file for this loan. An approved PLUS Credit Decision Status must be obtained for a PLUS borrower prior to disbursement.	Direct PLUS Loan	Resubmit Disbursement Release Indicator of "True" after an approved credit decision is obtained for this PLUS borrower.
181	R	Person	Invalid identifier change for PLUS award with PLUS Credit Decision Status Pending/Declined	A PLUS award with no approved PLUS Credit Decision Status is submitted with one or more of the following tags for student or borrower: SSN change Date of Birth change Last Name change NOTE: Only applicable for Award Years 2011-12 and prior.	Direct PLUS Loan	Resubmit SSN/DOB/Name change after an approved credit decision is obtained for this PLUS borrower.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
182	R	Award	Invalid award change for PLUS award with PLUS Credit Decision Status Pending/Declined	A PLUS award with no approved PLUS Credit Decision Status is submitted with award change that is not one of the following: Award Amount decreased to zero Award Amount decreased to less than Endorser Amount of valid Endorser NOTE: Any other award change will be rejected. NOTE: Only applicable for Award Years 2011-12 and prior.	Direct PLUS Loan	Correct the award amount to less than or equal to Endorser Amount submitted by valid Endorser or zero and resubmit.
183	W	Award	An approved endorser linked to the PLUS award.	An approved endorser linked to the PLUS award.	Direct PLUS Loan	No action required.
184	W	Award	Financial Award Amount exceeds Endorser Amount	A PLUS award linked to an approved Endorser and the Financial Award Amount is greater than the Endorser Amount.	Direct PLUS Loan	Schools must correct the award amount to less than or equal to the Endorser Amount submitted by valid Endorser and resubmit in order to establish actual disbursements for PLUS award.
191	R	Award	Incorrect HPPA Indicator	Foreign School submitted a Direct Unsubsidized Loan award with the HPPA Indicator equal to "true"	Direct Unsub Loan	Review the DL Unsubsidized award and change the HPPA Indicator from "true" to "false" then resubmit.
192	W	Award	Pell Award submitted with IAS Indicator equal to 'true'	Effective 2010 -11 <b>through 2023-24</b> : A Pell award record is submitted with the IAS Indicator equal to "true" for that award at that school.	IASG	Ensure the IAS Indicator should be equal to "true". No action required.
193	R	Award	Incorrect change to the IASG Indicator	This edit will trigger when the IAS Grant Indicator is updated incorrectly on an existing Iraq and Afghanistan Service Grant or Pell Grant award with Funded Disbursement(s). For Pell: Effective 2010 -11 <b>through 2023-24</b> : The IASG Indicator is changed from 'false' to 'true' for a Pell award with Funded Disbursement(s) For Iraq and Afghanistan Service Grant: Effective June 2018 <b>through 2024</b> : The IAS Grant Indicator is changed from 'true' to 'false' for an Iraq and Afghanistan Service Grant award with Funded Disbursement(s).	Pell Grant IASG	Review the Pell/Iraq and Afghanistan Service Grant award and disbursement information and the IASG Indicator.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
194	R	Award	Funded Disbursement not allowed for a Pell award with IASG Indicator equal to 'true'	A funded disbursement (DRI = true) was submitted on a Pell award with the IASG Indicator equal to 'true'. NOTE: Effective 2010-11 through 2016-17. Inactivated June 2018.	Pell Grant IASG	Review the Pell disbursement and change the DRI from 'true' to 'false' then resubmit.
195	R	Award	Missing Ability To Benefit State Code and/or Ability To Benefit Completion Date	If the Student Eligibility Code is 03, the record must contain a valid Ability to Benefit State Code and Ability to Benefit Completion Date NOTE: The COD System reinstated value of 03 in the Student Eligibility Code for the 2023-24 award and forward.	Pell Grant TEACH Grant Direct Loan	Resubmit with a valid State Code and Completion Date.
196	R	Award	Invalid Completion Date for the Submitted Student Eligibility Code	If the Student Eligibility Code is 03, the record must contain a valid Ability to Benefit Completion Date for the submitted Ability To Benefit State Code or the Ability to Benefit Completion Date is greater than the current COD processing date. If the Student Eligibility Code is 01 or 12 the record must contain a valid Ability to Benefit Completion Date for the submitted Ability To Benefit Test Code or the Ability to Benefit Completion Date is greater than the current COD processing date. NOTE: The COD System no longer accepts a value of 11 in the Student Eligibility Code for 2023-2024 and forward.	Pell Grant TEACH Grant Direct Loan	Resubmit with a valid Completion Date for the submitted or stored State or Test Code See the Help Text for the valid date ranges for the respective State and Test Codes.
197	R	Award	Missing Ability To Benefit Test Administrator Code, and/or Ability To Benefit Test Code, and/or Ability To Benefit Completion Date	If the Student Eligibility Code is 01 or 12 the record must contain valid values in the following tags, unless already stored on the COD system: <AbilityToBenefitTestAdministratorCode> <AbilityToBenefitTestCode> <AbilityToBenefitCompletionDate> NOTE: The COD System no longer accepts a value of 11 in the Student Eligibility Code for 2023-2024 and forward.	Pell Grant TEACH Grant Direct Loan	Resubmit with a valid Test Administrator Code, Test Code, and Completion Date.
198	R	Award	Incorrect Student Eligibility Code submitted.	If the Student Eligibility Code is 02, 04, 06, 07, 09, 10, 14 or 15, the record must not contain any of the following tags: <AbilityToBenefitTestAdministratorCode> <AbilityToBenefitTestCode> <AbilityToBenefitCompletionDate> <AbilityToBenefitStateCode> OR If the Student Eligibility Code is submitted for an award year where the code is not valid. *If attempting to change the Student Eligibility Code to a value that does not require additional Student Eligibility Code data elements, you must null out all the stored Student Eligibility Code values currently stored on	Pell Grant TEACH Grant Direct Loan	Verify the Student Eligibility Code submitted. Update the record as appropriate and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				COD. NOTE: The COD System no longer accepts 05, 08, 11, and 13 in the Student Eligibility Code tag.		
199	W	Award	'HS Diploma or Equivalent Field' on corresponding <b>FPS</b> transaction does not match Student Eligibility Code submitted	The <StudentEligibilityCode> submitted on the origination does not match the 'HS Diploma or Equivalent Field' from the <b>FPS</b> record that matches the < <b>FPSTransactionNumber</b> > submitted on the Common Record.	Pell Grant TEACH Grant Direct Loan	Verify the Student Eligibility Code submitted. Update the record as appropriate and resubmit
200	W	Person	150% Subsidized Usage Limit Applies to borrower	The borrower had no outstanding loan balance at the time a Direct Loan was received after June 30, 2013 and is subject to the 150% Subsidized Usage Limit. NOTE: Not applicable for Award Years 2014-15 and forward. NOTE: Though the warning edit may be returned at the borrower level, the subsidized usage will not be calculated for Direct Loans with an earliest disbursement date on or after July 1, 2021	Direct Loan	No action required.
201	C/R	Disbursement	Pell or Iraq and Afghanistan Service Grant LEU Exceeds the limit of 600%	Pell LEU or Iraq and Afghanistan Service Grant LEU exceeds the LEU Limit of 600%, for Pell LEU and Iraq and Afghanistan Service Grant LEU respectively, due to one or more of the following award or disbursement changes: Award Level Change: Cost of Attendance <b>FPS</b> Transaction Number Disbursement Level Change: Change to actual disbursement amount New actual disbursement Change to Disbursement Release Indicator NOTE: For correcting schools, Edit 201 will only update the Pell Grant disbursements that are submitted. Both correcting and rejecting schools may be subject to further de-obligation if there is no action taken within 30 days of the student's Pell LEU or Iraq and Afghanistan Service Grant LEU exceeding the 600% limit. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant IASG	Modify the Pell or Iraq and Afghanistan Service Grant award or disbursement level data, to bring the student's Pell LEU or Iraq and Afghanistan Service Grant LEU to 600% or less.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
202	R	Disbursement	Cannot submit more than one tag for Published Program Length.	<p>More than one of the following fields were submitted:  Published Program Length Years Published Program Length Months  Published Program Length Weeks  Only one of the above fields may be submitted for origination or maintenance for Award Year 2024-25 and prior.</p> <p>For Award Year 2025-26 and forward, more than one of the following fields cannot be submitted within the same CIP tag:  Published Program Length Years Published Program Length Months  Published Program Length Weeks</p>	Direct Loan TEACH Grant Pell Grant	Review the record to determine which Published Program Length fields were submitted. Correct the record so that there is only one, then resubmit
203	R	Award/Disbursement	Incorrect Special Program submitted.	<p>The award/disbursement contains an invalid Special Program and Student Level Code combination. If the Special Program submitted is 'T', 'P', 'A', 'B', or 'U', COD will perform one of the following validations:  If the Special Program is 'T' or 'P,' Student Level Code must be 5. If Special Program is 'A,' Student Level Code must be 0-5.  If Special Program is 'B,' Student Level Code must be 0-5. If Special Program is 'U,' Student Level Code must be 0-1. If any of the above criteria are not met, Edit 203 will trigger. Values of Special Programs are the following:  A: Selective Admission Associate Program B: Bachelor's Degree Completion Program N: Not Applicable  P: Preparatory Coursework Graduate Professional Program T: Non-Credential Teacher Certification Program  U: Preparatory Coursework Undergraduate Program</p>	Direct Loan TEACH Grant	Resubmit with a valid Special Program and Student Level Code combination
204	R	Disbursement	Incorrect Program CIP Code(s) submitted.	<p>The Program CIP Code(s) submitted with the disbursement is incorrect. One of the following are true:  The CIP Code(s) submitted does not apply to this program type.  The award is outside the effective date range for the CIP Code(s) submitted.</p>	Direct Loan TEACH Grant Pell Grant	Review the CIP Code(s) submitted with the award to ensure that it is a valid CIP Code(s). If so, review the effective date range for the CIP Code(s). Update with a correct CIP Code(s) and resubmit.
205	R	Award, Disbursement	Payment Period Start Date is outside the Award Begin and End dates.	<p>For Direct Loan:  The Payment Period Start Date for the disbursement is not contained within the Financial Award Begin and End dates and the disbursement date is within the loan period.  NOTE: This edit will not be triggered if the disbursement amount is equal to zero.</p>	Direct Loan	Review the Payment Period Start Date and compare with the Financial Award Begin and End dates. Update with a valid date and

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
				NOTE: Edit 205 will continue to be applied to disbursements not flagged with the Coronavirus Indicator. The disbursements can be associated to an award with disbursements flagged with the Coronavirus Indicator.		resubmit.
		Award Disbursement	Payment Period End Date is outside the Award Begin and End dates.	For Direct Loan The Payment Period End Date for the disbursement is not contained within the Financial Award Begin and End dates and the disbursement date is within the loan period. NOTE: This edit will not be triggered if the disbursement amount is equal to zero. NOTE: Edit 205 will continue to be applied to disbursements not flagged with the Coronavirus Indicator. The disbursements can be associated to an award with disbursements flagged with the Coronavirus Indicator. NOTE: This is applicable for award year 2022-23 and forward.	Direct Loan	Review the Payment Period End Date and compare with the Financial Award Begin and End dates. Update with a valid date and resubmit.
206	R	Award	The Remaining Subsidized Eligibility Period is less than zero for this award.	The student's Remaining Subsidized Eligibility has been calculated as less than zero with the submission of this award. For a Direct Subsidized Loan to accept, the calculated Remaining Subsidized Eligibility Period must be greater than or equal to zero. This edit will not be triggered when a maintenance record is submitted and the Remaining Subsidized Eligibility Period is increased or remains the same but the period is still less than zero. NOTE: Applicable for Award Year 2014-15 and forward only with an Earliest Disbursement before 07/01/2024.	Direct Subsidized Loan	This or another subsidized loan has resulted in a less than zero Remaining Subsidized Eligibility Period for this loan.
207	R	Disbursement	The Remaining Subsidized Eligibility Period is less than zero for this award after this disbursement was approved from the Action Queue.	The student's Remaining Subsidized Eligibility Period for this loan has been calculated as less than zero. This edit will not be triggered when a maintenance record is submitted and the Remaining Subsidized Eligibility Period is increased or remains the same but the period is still less than zero. NOTE: Applicable for Award Year 2014-15 and forward only with an Earliest Disbursement before 07/01/2024.	Direct Subsidized Loan	The student has a Remaining Subsidized Eligibility Period for this loan that is less than zero. The student is not eligible for additional subsidized loans for this program.
208	R	Award/Disbursement	Incorrect Student Level Code submitted.	The combination of Student Level Code and Program Credential Level submitted on the award/disbursement is invalid. COD performs the following validations on Student Level Code with Program Credential Level: If Program Credential Level is 01-04 or 99, then Student Level Code must be 0-5 If Program Credential Level is 05-08, then Student Level Code must be 0-7 If any of the above criteria are not met, Edit 208 will trigger. NOTE: Applicable for Award Year 2014-15 and forward only.	Direct Loan TEACH Grant	Resubmit with a valid Student Level Code/Program Credential Level combination.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
209	R	Disbursement	Invalid value submitted for Weeks Programs Academic Year.	The value submitted for Weeks Programs Academic Year is less than 26. NOTE: This will continue to be returned at the award level for Direct Loans awards for 2016-17 year and prior.	Pell Grant TEACH Grant Direct Loan	Review Weeks Programs Academic Year submitted. Update with a valid value and resubmit.
210	R	Document	Invalid Schema	The incoming file has failed full and partial Common Record XML schema validation. The batch and its information have not been processed into the COD system. XML errors must be fixed and resubmitted using a new document batch ID.	Pell Grant TEACH Grant Direct Loan	Review the Common Record Schema and resubmit.
212	R	Disbursement	Previous disbursement sequences have not been processed	<p>Previous disbursement sequences exist on files that have not been processed by the payment analyst.</p> <p>Triggered during maintenance for all program types for disbursements when: Maintenance is being performed on a disbursement and There is a disbursement sequence number change and The disbursement is 'in review' and needs to be approved by a PA (payment analyst).</p> <p>NOTE: Only applicable to HCM2 and HCM3 schools. OR</p> <p>Triggered on a disbursement that has been flagged with a Coronavirus Indicator when:</p> <p>Maintenance is being performed on a disbursement, and</p> <p>The disbursement has an Award Year greater than or equal to 2019, and</p> <p>The disbursement has been flagged with the Coronavirus Indicator.</p> <p>NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.</p>	Pell Grant TEACH Grant Direct Loan IASG	Previous disbursement sequences must be processed before maintenance is accepted.
213	R	Award	Actual Disbursement Submitted with EDD after Configurable Date	<p>The Direct Loan disbursement submitted has a DRI of "true" and the Earliest Disbursement Date for the award falls on or after the configurable date.</p> <p>NOTE: The configurable date is set in COD to prevent the acceptance of Direct Loan disbursements on awards with incorrect Origination Fee and/or Interest Rebate Percentages per the award's Earliest Disbursement Date. The date is set based on the anticipated effective date of a fee or rebate percentage change when the new percentage is unknown.</p> <p>NOTE: Applicable on September 2014 and forward.</p>	Direct Loan	Update record as appropriate and resubmit.



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
214	W	Award	Foreign Address Submitted on DLP Award	The permanent address submitted on the DLP award was in a foreign country and the temporary address was either not submitted or not domestic.	Direct Loan	If the borrower has a current U.S. address available submit that address in the Alternate/Temporary Address. If the borrower has no U.S. address, call COD School Relations.
215	W	Person	Student reported as deceased on a subsequent CPS transaction	Student reported as deceased on a subsequent CPS transaction received after a CPS transaction has been linked to an award. NOTE: Applicable for Award Years 2012-13 <b>through 2023-24</b>	Pell Grant TEACH Grant Direct Loan	If this information is incorrect, the student should contact the Social Security Administration. If the information is correct, make the appropriate changes to the award and disbursements reported. For more information please refer to the Federal Student Aid Handbook, Volume 5, Chapter 1 when a student receiving Title IV aid dies during the payment period or period of enrollment.
216	R	Award	No parent identifier match found	The parent SSN and DOB combination doesn't match the parent data reported on the student's <b>FPS</b> transactions, and the parent's identifiers don't match the identifiers reported by the credit agency used for the parent's credit check.	Direct PLUS Loan	Update record as appropriate and resubmit.
217	R	Disbursement	Actual disbursement submitted with no PLUS Counseling on file	The Direct PLUS Loan borrower has adverse credit and cannot receive actual disbursements until PLUS Counseling is completed.	Direct PLUS Loan	Resubmit record with anticipated disbursements.
218	R	Document	Software Provider and/or Software Version is missing	The Software Provider and/or Software Version was not submitted. NOTE: Applicable for 2015-16 Award Year and forward	Pell Grant TEACH Grant	Update record as appropriate and Resubmit



COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
					Direct Loan	
219	C	Award	Award Amount was greater than the sum of the Disbursement Amount(s); Correction Applied.	Award Amount is greater than the sum of Disbursement Amount(s). Correction applied. NOTE: Applicable for 2016-17 Award Year and forward	Direct Loan TEACH Grant	Correction applied. No action required
220	W	Disbursement	The disbursement has an amount of \$0 and a payment period start date within the loan period.	The disbursement is at zero and the payment period start date is within the loan period. NOTE: Applicable for 2014-15 Award Year and forward	Direct Loan	Update the loan period beginning and/or ending date to remove any terms/payment periods for which disbursement(s) are zero
221	W	Person	Pell LEU Restoration Due to Closed School	Student has undergone a restoration of a portion of their Pell Lifetime Eligibility Used (LEU) due to their attendance at a closed school.	Pell Grant TEACH Grant Direct Loan	Review guidance contained in separate notice.
222	C/R	Award	Award Amount Less Than Total Disbursement Amount.	Award Amount is less than the Total Disbursement Amount of all actual and anticipated disbursements. Edit 222 will be triggered on award and/or disbursement maintenance for all award years. NOTE: Applicable June 2018 and forward.	TEACH Grant Direct Loan	Review the disbursement amount for each disbursement number and compare to the award amount.
223	R	Award	New award submitted for student that did not previously receive a Direct Loan for the attended school before the school's loss of eligibility.	The following conditions must apply: The school is outside the U.S. The attended school has lost Direct Loan eligibility and was granted a Foreign School Processing Extension. The awards EDD falls within the processing extension period. The student doesn't have a previous Direct Loan award with an actual disbursement from any Award Year from the same attending school. NOTE: Applicable June 2018 and forward.	Direct Loan	The disbursement must be submitted during a period of eligibility.
224	W	Award	Pell Award submitted with CFH Indicator equal to 'TRUE'.	The Children of Fallen Heroes (CFH) Indicator is marked as "true" and the student received award or disbursement activity. *Applies only to Award Year 2018-19 through 2023-24	Pell Grant	No Action Required

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
225	R	Disbursement	Actual disbursement submitted with no Informed Borrowing Completion on file	The Direct Loan cannot receive actual disbursements until Informed Borrowing is completed for the applicable award year. This Rejecting Edit is NOT currently active.	Direct Loan	Resubmit record with anticipated disbursements.
226	R	Award	Direct Loan Cost of Attendance submitted was less than the Direct Loan Award amount	The Direct Loan Cost of Attendance amount cannot be less than the Direct Loan award amount. Note: This edit is applicable for award year 2022-23 and forward.	Direct Loan	Review the Direct Loan Cost of Attendance amount and compare it to the Direct loan award amount.
227	R	Disbursement	Payment Period End Date submitted is less than or equal to the Payment Period Start Date	The Payment Period End Date submitted for a disbursement is less than or equal to Payment Period Start Date. NOTE: This edit is applicable for award year 2022-23 and forward.	Pell Grant TEACH Grant Direct Loan	Review the Payment Period End date and compare it to the Payment Period Start Date. Update record as appropriate and resubmit.
228	R	Award, Disbursement	Payment Period Start Date is outside the valid Award Date Range for the associated Award Year.	For Pell, IASG and TEACH: The Payment Period Start Date for the disbursement is not contained within the valid award date range for the associated award year. NOTE: This edit will not be triggered if the disbursement amount is equal to zero. NOTE: Edit 228 will be applied to disbursements not flagged with the Coronavirus Indicator. The disbursements can be associated to an award with disbursements flagged with the Coronavirus Indicator. NOTE: This edit is applicable for award year 2022-23 and forward. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant TEACH Grant	Review the Payment Period Start Date and compare with the Award date range for the associated award year. Update with a valid date and resubmit.
			Payment Period End Date is outside the valid Disbursement Date Range for the associated Award Year.	For Pell, IASG and TEACH: The Payment Period End Date for the disbursement is not contained within the valid disbursement date range for the associated award year. NOTE: This edit will not be triggered if the disbursement amount is equal to zero. NOTE: Edit 228 will be applied to disbursements not flagged with the Coronavirus Indicator. The disbursements can be associated to an award with disbursements flagged with the Coronavirus Indicator. NOTE: This edit is applicable for award year 2022-23 and forward. NOTE: AY 2017-18 through 2023-24 for Iraq and Afghanistan Service Grant.	Pell Grant TEACH Grant	Review the Payment Period End Date and compare with valid Disbursement date range for the associated award year. Update with a valid date and resubmit.

COD Edits No.	Edit Type	Block	Message	Condition	Award Types Affected	How to Fix Record
229	W	Person	Pell LEU Restoration due to eligible loan discharge	Student has undergone a restoration of a portion of their Pell Lifetime Eligibility Used (LEU) due to the discharge of an eligible loan.	Pell Grant TEACH Grant Direct Loan	No action required.
993	C	General	Missing Value: Correction Applied	Content was not submitted for a required field. Correction applied.	Pell Grant	Correction applied. No action required.
994	R	General	Missing Value	Content was not submitted for a required field. The content has not been loaded to COD.	Pell Grant TEACH Grant Direct Loan	Review the Format and Valid Values cell corresponding to the rejected tag. Update record as appropriate and resubmit.
995	C	General	Invalid Value; Correction Applied	The content submitted did not conform to valid values according to COD Business Rules. Correction Applied.	Pell Grant	Correction applied. No action required.
996	R	General	Invalid Value	The content submitted did not conform to valid values according to COD Business Rules. The content has not been loaded to COD. Edit 996 will not be returned on PLUS & Grad PLUS disbursements if incorrect origination fees are submitted on the disbursement. Note: Edit 996 will trigger a batch response for cancelled or archived award years.	Pell Grant TEACH Grant Direct Loan	Review the Format and Valid Values corresponding to the rejected tag. Update record as appropriate and resubmit
997	C	General	Invalid Format; Correction Applied	The content submitted did not conform to the valid format according to COD Business Rules. Correction applied.	Pell Grant	Correction applied. No action required.
998	R	General	Invalid Format	The content submitted did not conform to the valid format according to COD Business Rules. The content has not been loaded to COD.	Pell Grant TEACH Grant Direct Loan	Review the Format and Valid Values corresponding to the rejected tag. Update record as appropriate and resubmit.

Table 75: Edits Table  
An em dash or “—” indicates no data.