

**Subsidized Usage Limit Applies (SULA):
Part 2 ~
Misunderstandings & Misreporting**

Zack Goodwin
U.S. Department of Education
IASFAA Conference, Johnston, IA

Federal Student Aid | PROUD SPONSOR of the AMERICAN MIND®
An OFFICE of the U.S. DEPARTMENT of EDUCATION

April 2019

Agenda

- **SULA Requirements Overview**
- **Common Origination & Disbursement (COD) Reporting**
Misunderstandings & Misreporting
 - Remaining eligibility less than 1.0 year
 - Closing out the award year
- **National Student Loan Data System (NSLDS®) Reporting**
 - Loss of subsidy
- **Resources**



2 | Federal Student Aid | PROUD SPONSOR of the AMERICAN MIND®

Who Does What?

- System of record
 - **COD** runs edits on incoming records to block loans/disbursements that would exceed the MEP
Edit 206 loan reject? 
 - **NSLDS** determines eligibility to retain the interest subsidy on loans already awarded
Loss of subsidy (LOS)? 

3 | Federal Student Aid | PROUD SPONSOR of the AMERICAN MIND®

All Prior Subsidized Usage Counts

Student just began in our program but the loan rejected (edit 206). How can the student have run out of eligibility already?

- Regardless of the program or school, or even if the student completed the prior program, all prior subsidized usage counts against the current MEP
- There is just one exception – usage from non-credential teacher certification programs calculated separately

New Loans Despite a Loss of Subsidy

Since the student has a loss of subsidy on a loan does that mean no more subsidized loans can be awarded?

- Not necessarily because the student may now be in a longer program with a higher MEP and thus more eligibility for subsidized loans

No More Subsidized Eligibility – at this time

REP is too low for another subsidized loan so can we no longer worry about awarding subsidized loans?

- Things change so having no additional subsidized eligibility may not be permanent
 - student could return less than full-time
 - student could enroll in a longer program
 - an update/correction may be made on a prior loan
 - a prior loan could go through a closed school discharge
 - using the 120-day rule student could return a full disbursement to the school



Accepted then Rejected

If the loan origination record was accepted then how come it's now rejecting when I submit actual disbursements?

- That question is usually followed with a ... *grrr!*
- **Something changed** – usually the enrollment status was reported as less than full-time in the origination, full-time on the actual disbursement
- But we also sometimes see a shorter program length reported on the actual disbursement
- Best tool to see what was *actually* sent – **COD Batch Search**



Serial Loans

Can schools report a series of single-term loans instead of a single subsidized loan for the entire academic year?

- Yes, but in addition to the increased workload;
 - would still need to do multiple disbursements for each loan (unless default rate warranted single disbursements)
 - COD rounds at the loan level, not the academic year level
- 4 SUPs: $0.25 \times 4 = 1.2$ years (each 0.25 first rounds to 0.3)
- 3 SUPs: $0.33 \times 3 = 0.9$ year (each 0.33 first rounds to 0.3)



PPSD is *not* the Loan Period Start Date

All the loan's Payment Period Start Dates (PPSDs) are the same (usually the loan period begin date)

- PPPSD should be the first day of each *term* or *payment period*
- School's reported PPPSDs:
 - fall start: 9/10/17 disbursement: full-time PPPSD: 9/10
 - winter start: 1/10/18 disbursement: three quarters time PPPSD: **9/10**
 - spring start: 3/10/18 disbursement: half-time PPPSD: **9/10**
- COD calculates this SUP: **1.0 year**
- Correct SUP: **0.8 year**

Enrollment as of the *Disbursement Date*

Reporting the enrollment status as of the census date instead of the disbursement date

Report enrollment status as of the *disbursement date*

- fall disbursement date: 9/10/17 (enrollment this date was half-time)
- school census date: 9/20/17 (enrollment this date was full-time)
- incorrect enrollment status reported to COD: **full-time**
- **result:** inaccurate subsidized usage calculation (in this example student is overcharged usage)



Degree Completion Programs

Misreported program length for students in Bachelor's Degree Completion Program or Special Admission Associate's Degree Program



If these programs qualify they should be reported as 4-year programs

- Programs are being reported to COD and NSLDS as 2 years, resulting in loans rejected by COD for exceeding the MEP and in loss of subsidy determinations at NSLDS
 - *Incidentally*, just because a student is completing a bachelor's degree does not make it a Bachelor's Degree Completion Program

Loan Period Dates

Loan period dates do not coincide with dates of terms/payment periods

fall term: 9/10/18 – 12/15/18 spring term: 1/10/19 – 5/20/19
 incorrect loan period reported: 9/20/18 – 5/10/19
 SUP: 0.9 year

- Why did the school report this? Because REP = 0.9 year
- School shaved off days from the beginning/ending of the loan period until the SUP did not exceed the REP



Academic Year Dates

Incorrectly reported academic year dates impact SUP and annual loan limit calculations

- In addition to causing headaches for transfer students with annual loan limits
- It is a basic element of a loan's subsidized usage calculation:
SUP = length of loan period + length of academic year
- The academic year you report should be the period used to track annual loan limits
- Regulatory minimum is 26 weeks or 30 weeks
- A single-term academic year is never correct



Reporting Summers

Misreporting summer can impact a loan's subsidized usage

- This pertains to scheduled academic year reporting with summer headers or trailers
- Report summer as part of the academic year only if:
 - you require summer enrollment, or
 - a summer disbursement is made (and retained)



When to Add (or **Subtract**) a Summer

Scheduled Academic Year schools with a summer header or trailer reporting summer in academic year though no summer disbursement was made and summer enrollment not required

- Disbursements made: fall, winter, spring
- Loan period: fall-winter-spring
- Academic year: fall-winter-spring-summer
- SUP = length of LP + length of AY = 3 terms/4 terms = **-0.75 year**
- SUP should be **1.0 year**
- **Update the academic year to remove summer**

When to **Add** (or Subtract) a Summer

Fall-spring loan awarded, later a summer loan added but failed to update the fall-spring loan's academic year to include summer

Wrong:

001 loan SUP = fall-spring / **fall-spring** = 2/2 = **1.0 year**
002 loan SUP = summer / fall-spring-summer = 1/3 = **0.3 year**

Right: Update the academic year to add summer

001 loan SUP = fall-spring / **fall-spring-summer** = 2/3 = **0.7 year**
002 loan SUP = summer / fall-spring-summer = 1/3 = **0.3 year**



Published Program Length

Since when is 24 months not 2 years?

- Since your academic year is not 52 weeks long
- If you have a Weeks Programs Academic Year of 30 weeks
- Then a 24-month program converts to 3.428 years
- A 2-year program has a MEP of 3.0 years
- But a 3.428-year program has a MEP of **5.1 years**
- Have you been awarding over 3.0 years of subsidized loans?
 - those loans will need to be removed
 - cannot be retroactively replaced with unsubsidized loans



Reporting Published Program Length

What to report to COD and NSLDS

- If published (catalog, website, promotional materials) report to COD and NSLDS **what was published**
- If not published and it's an associate or bachelor's degree program report **2 years or 4 years**, respectively, unless the academic design of the program makes it longer or shorter than typical
- For all other programs where school has not published the program length it is based on the school's determination of how long, in weeks, months, or years, the program is designed for a **full-time student to complete**



Loan Updates

When do loans need to be updated?

- If you added summer to the academic year of the 001 loan (slide 26) but the student doesn't get that summer disbursement after all (or receives it but it is later zeroed out) – be sure to go back in and remove the summer
- On any loan if a disbursement is not made that pending disbursement must be zeroed out
- Reduce the loan amount to the total amount disbursed
- Shorten the loan period so only terms/payment periods with a disbursement made and retained are included
- Loan update timing is under the 15-day reporting requirement



Remaining Eligibility Less than 1.0 Year

- Still may be able to award another subsidized loan
- Are any loans already on the system which when corrected/updated will free up subsidized eligibility?
- If loan was rejected (edit 206) may be able to reconfigure and resubmit it
- Reducing the loan period, if appropriate (next slide), is usually a necessary step
- If loan limit exception triggered the loan amount will need to be backed off the annual limit (but any amount will stop the exception from triggering)
- Were the enrollment statuses & program length correctly reported?



Minimum Loan Period

- Credit-hour, standard term or non-standard term SE9W* programs: **minimum loan period is the term**
- Clock-hour, non-term or non-standard term NSE9W* programs: **minimum loan period is the lesser of:**
 - length of the program
 - remaining portion of the program
 - academic year
 - remaining period to "finish out" the academic year of the transfer student

*SE9W: Substantially Equal terms at least 9 Weeks in length
*NSE9W: Non SE9W

Reducing the Loan Amount for Edit 206

- Loan limit exception is the second step in COD's calculation of a loan's subsidized usage
 - but the enrollment exception is the third step (slide 8)
- may not have to reduce the loan amount if the enrollment exception would take the SUP down to the REP or less
- but if you do need to reduce the loan amount – a reduction of **any amount** less than the annual loan limit will keep the exception from triggering
 - don't multiply the REP by the annual loan limit **common mistake**
 - but don't exceed need for the (new) loan period of course

Record Rejected at COD

- Whether it was SULA edit-206 or any other reject (i.e. loan fee)
- COD treats a rejected record as if it was never sent
- So if the loan was never accepted at COD it doesn't need to be inactivated at COD
- Sending in zeroed out disbursements (and loan amount) on a loan they don't have will just get that one rejected too (doesn't do much for your attitude either)
- You can still see what you sent that got rejected – but only in Batch Search (think of it as the front porch where packages are delivered before being allowed in the front door)



Closing out the Award Year

SULA updates must be completed as you are processing loans

- 15-day reporting requirement prevails over program year closeout clean-up activities
- But certainly before you close the year all unused (pending) disbursements must be zeroed out (on all loan types)
- Loan amount reduced to the sum of the actual disbursements
- Loan periods to contain only terms/payment periods with disbursements
- Academic years correctly reported/updated

SULA Adjustments Needed Report

- Report will be renamed **Discrepant Loan Data Report**
 - Report identifies corrections needed - for all loan types
 - Sent to schools near the end of their award year loan processing (keys off latest loan period end date)
 - Schools are responsible for making the corrections
 - Once closeout is confirmed, COD will make the updates it can if schools failed to so to keep the student from being harmed
 - COD will not make changes to academic year dates
 - COD does not know when a term/payment period ends, only when it began, so when it has to shorten a loan period it's just an approximation



A Caution When Closing out the Award Year

- Take a moment and check what award year is being displayed before clicking on the Balance Confirmation on the COD website
 - Remember that after a new award year is added to COD that award year becomes the default
 - On a couple of occasions when schools thought they were confirming closeout for one award year they didn't realize a different award year was displayed
 - COD then went in and zeroed out all their pending disbursements and reduced all the loan amounts to zero!



Re-opening a Closed-out the Award Year

- Despite enhanced COD SULA processing and edits implemented in late 2016 – you may still occasionally need to re-open an award year (hopefully rarely)
- Request extended processing on the COD website (call COD for guidance if needed 1-800-848-0978)
- Be aware that a re-opened award year generates an automatic email sent to the school president
- Some schools find it beneficial to give the president's office a heads-up that one is coming (may limit unnecessary freak-outs)



SULA Adjustments Needed Report - *enhancements*

- **Discrepant Loan Data Report**
 - COD release implementation on 12/7 – 12/9/2018
 - Loans that are inactive will no longer display
 - Loans that have all the disbursements' Payment Period Start Dates (PPSD) the same will no longer display IF the loan period is shorter than the academic year
 - to remove single-term loans where multiple disbursements would naturally have the same PPSD
 - Formatting/structure clean-up for ease of use

LOS vs. Reinstatements

Total Number of Loans that have Lost Interest Subsidy	Total Number of Borrowers that have Lost Interest Subsidy	Total Number of Schools that have a loan that has Lost Interest Subsidy
305,959	101,665	4,996
Total Number of Loans that have Interest Subsidy Reinstated	Total Number of Borrowers that have Interest Subsidy Reinstated	Total Number of Schools that have a loan that has Interest Subsidy Reinstated
151,833	55,981	4,557

* As of: October 2018

Common Misreporting to NSLDS

- Most common reporting problems include the following fields:
 - Program Status Effective Date
 - Program Begin Date
 - Published Program Length
- Two common reporting scenarios that cause Loss of Subsidy (LOS):
 - Incorrect data or improper gaps in enrollment
 - Enrollment information reported by other schools

Program Effective Date

- The Program Status Effective Date is the *earliest* date when the student's program status first took effect
 - The student's status is critical to determining borrower's eligibility to retain subsidy on their loans
 - The Program Status Effective Date should remain the same as long as the student stays enrolled in the same enrollment status

Program Effective Date

- Advancing the Program Status Effective Date using the existing status is considered a correction to previously reported records
- Do not advance the Program Status Effective Date unless the student's enrollment status changed since the last reporting

NORTH SOUTH UNIVERSITY - 0678900											
CIP Code: 090902		Title: Public Relations/Image Management		Published Prog. Length in Yrs: 4.0		Special Program Indicator: N		Reported Program Length: 4.0 Years		Weeks in Academic Year: 0.0	
Credentialed Level: BS - Bachelor's Degree		Prog. Begin Date: 04/27/2016		Earliest Cert.		Latest Cert.		Times Certified		Latest Date Received	
Reported By	Reported By ID	Status	Eff. Date	Active	Earliest Cert.	Latest Cert.	Latest Cert. Method	Times Certified	Latest Date Received	Current	
School	0678900	Full Time	01/01/2018	Active	01/01/2018	05/04/2018	School Batch	11	09/06/2018	Current	
School	0678900	Full Time	08/16/2017	Inactive	08/25/2017	12/15/2017	School Batch	5	01/04/2018	Not Current	
School	0678900	Full Time	01/01/2017	Inactive	01/20/2017	05/05/2017	School Batch	5	05/18/2017	Not Current	
School	0678900	Full Time	10/14/2016	Inactive	11/21/2016	12/16/2016	School Batch	2	01/09/2017	Not Current	
School	0678900	Full Time	08/16/2016	Inactive	08/27/2016	10/14/2016	School Batch	3	11/04/2016	Not Current	
School	0678900	Full Time	04/27/2016	Inactive	05/05/2016	05/05/2016	School Batch	1	06/18/2016	Not Current	

Program Begin Date

- The Program Begin Date is the date the student first began attending the program being reported
 - The Program Begin Date is important because it helps establish the start of the student's Maximum Eligibility Period (MEP)
 - If a student withdraws from the program and later returns to the exact same program, the school is not required to report a newer Program Begin Date

Program Begin Date

- The Program Begin Date is the date the student started in the program of study and does *not* change based on a new term date

NORTH SOUTH UNIVERSITY - 0678900										
CIP Code: 141001		Title: Mechanical Engineering		Published Prog. Length in Yrs: 4.0		Special Program Indicator: N		Weeks in Academic Year: 32.0		
Credentialed Level: 03 - Bachelor's Degree		Reported Program Length: 4.0 Years								
Reported By	Reported By ID	Status	Eff. Date	Active	Earliest Cert.	Latest Cert.	Latest Cert. Method	Times Certified	Latest Date Received	Current
School	0678900	Graduated	05/05/2018	Active	06/26/2018	06/26/2018	School Batch	1	07/04/2018	Current
School	0678900	Full Time	01/01/2018	Active	01/01/2018	05/04/2018	School Batch	6	05/15/2018	Not Current
School	0678900	Full Time	08/16/2017	Inactive	08/25/2017	12/15/2017	School Batch	5	01/04/2018	Not Current
School	0678900	Full Time	01/01/2017	Inactive	01/20/2017	05/06/2017	School Batch	6	08/04/2017	Not Current
School	0678900	Full Time	08/16/2016	Inactive	08/27/2016	12/15/2016	School Batch	5	01/09/2017	Not Current
School	0678900	Full Time	01/04/2016	Inactive	01/21/2016	05/05/2016	School Batch	5	05/16/2016	Not Current
School	0678900	Full Time	08/16/2015	Inactive	08/26/2015	12/15/2015	School Batch	5	01/09/2016	Not Current
School	0678900	Full Time	01/01/2015	Inactive	03/24/2015	05/08/2015	School Batch	3	06/05/2015	Not Current

34

FederalStudentAid

Published Program Length

- Schools have the option to report the Published Program Length (PPL) in Weeks, Months or Years. See Electronic Announcement #17 (4/20/15) for what length is appropriate to report
- When the PPL is reported in Months or Weeks, NSLDS uses a conversion based on the 'Weeks in Programs Academic Year' (WPAY) field to determine the Published Program Length in Years
- Conversion formula if schools report in Months: $PPLY = (PPLM \times 30) / (WPAY \times 7)$ and if schools report in Weeks: $PPLY = PPLW / WPAY$
 - 4 years = 4 PPLY X 150% = 6.0 MEP
 - 48 months = (48 PPLM x 30)/(32 WPAY x 7) = 6.428 PPLY X 150% = 9.642 MEP
 - 208 weeks = 208 PPLW / 32 = 6.5 PPLY X 150% = 9.75 MEP

NORTH SOUTH UNIVERSITY - 0678900										
CIP Code: 270101		Title: Mathematics, General		Published Prog. Length in Yrs: 4.0		Special Program Indicator: N		Weeks in Academic Year: 32.0		
Credentialed Level: 03 - Bachelor's Degree		Reported Program Length: 48.0 Months								
Reported By	Reported By ID	Status	Eff. Date	Active	Earliest Cert.	Latest Cert.	Latest Cert. Method	Times Certified	Latest Date Received	Current
School	00118400	Full Time	01/29/2018	Active	02/14/2018	05/23/2018	School Batch	8	09/05/2018	Current

35

See NSLDS EA 22 for more information.

FederalStudentAid

Reporting Continuous Enrollment

- A student is considered to be continuously enrolled during a period of non-required attendance (ex. summer) if the student is expected to return for the next regularly scheduled term:
 - There is no reason for the school to believe that the student will not enroll on an at least half time basis for the next regularly scheduled term; and
 - The student was enrolled at least half time at the end of the previous regularly scheduled term
- If the student does not return for the next regularly scheduled term, the school should report the borrower as withdrawn based on their last date of attendance

NORTH SOUTH UNIVERSITY - 0678900										
CIP Code: 020401		Title: Education		Published Prog. Length in Yrs: 0.0		Special Program Indicator: N		Weeks in Academic Year: 0.0		
Credentialed Level: 01 - Bachelor's Degree		Reported Program Length: 0.0 Years								
Reported By	Reported By ID	Status	Eff. Date	Active	Earliest Cert.	Latest Cert.	Latest Cert. Method	Times Certified	Latest Date Received	Current
School	0678900	Full Time	08/16/2018	Active	08/16/2018	08/16/2018	School Batch	1	08/04/2018	Current
School	0678900	Less Than Half	05/15/2018	Active	05/15/2018	07/31/2018	School Batch	3	08/04/2018	Not Current
School	0678900	Full Time	05/15/2017	Active	05/15/2017	07/31/2017	School Batch	3	08/04/2017	Not Current
School	0678900	Full Time	01/15/2017	Active	02/02/2017	03/29/2017	School Batch	3	04/02/2017	Not Current
School	0678900	Full Time	01/15/2016	Active	02/02/2016	03/29/2016	School Batch	3	07/02/2016	Not Current
School	0678900	Full Time	01/15/2015	Active	01/15/2015	03/10/2015	School Batch	3	04/02/2015	Not Current
School	0678900	Full Time	01/15/2014	Active	1/15/2014	3/10/2014	School Batch	3	07/15/2014	Not Current

36

FederalStudentAid

SULA Inquiry and Calculator

- COD Website**
- Go to Person Search
 - Bring up the student
 - Direct Loan
 - View Undergraduate Usage History

- SULA Inquiry**
- Student-specific questions
 - Over 4,000 researched to date

- SULA Calculator**
- Won't send, remove or harm any loans on the system



Thank You

Follow-up questions? Contact:
AskaFed@ed.gov



?


