

Title IV Reconciliation



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Agenda

- Reconciliation basics
- What to expect from FSA
 - How funds are initiated, increased, decreased, deadlines, etc.
- Tips for internal reconciliation
- COD and G5 website funding screens
- Selected COD reports
- Review of changes
- What's ahead?



- General definition-Reconcile: to bring into agreement or harmony; make compatible or consistent
- FSA definition- The process by which Title IV aid (grants, loans and campus based aid) recorded on the Department of Education systems, is reviewed and compared with a school's internal records.
- A school must
 - Identify and resolve discrepancies
 - Document reasons for any ending cash balances





- Internal reconciliation is matching business office, bursar office, and comptroller office data with financial aid system origination and disbursement data
- Disbursement definition
 - 34 CFR 668.164(a) "...an institution makes a disbursement of title IV, HEA program funds on the date that the institution credits a student's account at the institution or pays a student or parent directly with (i) funds received from the Secretary;...(iii) institutional funds used in advance of receiving title IV, HEA program funds."





- Ensure that...
 - What is posted to student accounts (i.e., amount and date) matches exactly the data found in the school financial aid software
 - Net Drawdowns (ND) = Net Accepted and Posted Disbursements (NAPD)
 - Cash is not held beyond cash management requirements
 - Internal cash transactions match school bank statements



- External reconciliation matches your internal reconciliation result to disbursement data in FSA systems, i.e., COD
 - Internal school disbursement data (both business office and financial aid office) match exactly to disbursement data in FSA systems, i.e., COD and FISAP
 - Net Drawdowns (ND) = Net Accepted and Posted Disbursements (NAPD)
 - Cash is not held beyond cash management requirements
 - Internal cash transactions match school bank statements





- Cash transactions
 - Drawdowns, drawdown adjustments, and refunds of cash transactions in school internal records match exactly with like transactions in COD, FISAP, and G5



- Monthly reconciliation REQUIRED for Direct Loans (recommended for all programs)
- FSA Handbook 2012-13 Volume 4-10
 - "A school must submit Federal Pell Grant, TEACH Grant, and Direct Loan disbursement records no later than 30 days after making a disbursement or becoming aware of the need to adjust a student's disbursement."
- <u>All</u> Title IV Aid 30 day disbursement/adjustment reporting requirement published annually in the Federal Register
 - http://ifap.ed.gov/fregisters/FR062912AppReportRecord1112.html





- Regulatory requirements
 - Perkins- 34 CFR 674.19 (d) (1)
 - FWS- 34 CFR 675.19 (b)(2)(iv)
 - SEOG- 34 CFR 676.19 (b)(2)
 - Direct Loan- 34 CFR 685.102 (b)
- Cash Management Regulations
 - 34 CFR 668.161-166 (SubPart K)





What to Expect from FSA

- Initial Authorizations
- Funding Increases
- Funding decreases
- Tools to assist with reconciliation
- Close out deadlines



Initial Authorizations

- Campus Based
 - Initial allocations based on prior year FISAP reporting announced Spring of each year
- PELL
 - No initial authorization- funding is increased by reporting, and having accepted by COD, actual disbursement records
- Teach
 - No initial authorization- funding is increased by reporting, and having accepted by COD, actual disbursement records
- Direct Loan
 - Initial authorization for Advance funded schools available in Spring



Funding Increases

- Campus Based-Supplemental Campus based awards, if available, announced in late summer
- Pell and Teach- increases made available only by reporting (and having accepted) actual disbursement records. Can report up to 7 days in advance of the actual disbursement date
- Direct Loans (advance funded schools only)
 - Additional CFL increase in November
 - Submit actual disbursement records up to 7 days in advance of actual disbursement date. Disbursements that exceed CFL will result in an automatic increase
 - Contact COD customer service to request an increase in CFL





Funding decreases

- Campus Based
 - Authorizations in G5 reduced to level of expenditures reported on FISAP
 - 2011/2012 award year scheduled for March 2013
- Direct Loans
 - Authorizations in G5 reduced to Net Draws (ND)
 - Immediately following the close of the award year
 - For example 2010/2011 DL was reduced August 2012





Funding decreases

- Pell
 - Authorizations in G5 reduced to Net Drawdown (ND)*
 - Pell 2009-2010 was reduced March 2012
 - Verification W Reduction
 - April, August and October 2012 for Pell 2011-2012

*Not scheduled to run for Pell 2010-2011 at this time



Funding Decreases

- Why are these decreases important to reconciliation?
 - Could influence how your Business Office views their being reconciled or not as they'll see a \$0 available balance
- The available balances in G5 for Campus Based programs may not match expenditures reported on FISAP
 - Did you draw down all the money you should have?





Funding Decreases

- The available balances in G5 for Grants and Direct Loans may not match the disbursements reported in COD
 - Direct Loan downward adjustments DO NOT impact the available balance on G5
 - Pell return of funds but downward adjustment not taken in COD
 - POP
- To properly reconcile YOU MUST ensure that net draws reflected in COD and G5 = Net Applied and Posted Disbursements





Deadlines

- CLOSE OUT/ RECONCILIATION DEADLINES
 - Campus Based FISAP filing deadline September 30th
 - Pell September 30th of the award year
 - Teach September 30th of the award year
 - Direct Loan July 31st of the year following the award year
 - The close out deadline for Direct Loans 2011-2012 will be July 31, 2013

NOTE - system processing deadlines may impact the actual date final disbursements are accepted





Deadlines

- You must follow all existing regulations for drawing funds and reporting disbursements and disbursement adjustments timely
- Most schools should be able to reconcile and complete processing well before close out deadlines
- You MUST monitor IFAP closely for announcements related to funding and reconciliation deadlines for ALL Title IV programs



Tools

- Pell
 - Electronic Statement of Account- cash (SAIG)*
 - Pending disbursement list (SAIG and Web)
 - Reconciliation Report summary level disbursement totals (SAIG)*
 - Year to Date (YTD) file detail disbursement data (SAIG)*

^{*}Obtained via data request on the COD website



Tools

- Direct Loans and Teach
 - Pending disbursement list (SAIG and Web)
 - Actual disbursement list (SAIG and Web)
 - School Account Statement (SAS)- (SAIG)
 - New for 2013: SAS Disbursement Detail on Demand (SAIG)
 - Direct Loan Tools software for DL SAS reconciliation assistance
- Pell, Direct Loan and Teach
 - COD school monitoring report (SAIG and Web)
 - COD Action Queue (Web)
 - COD reconciliation specialists





Tips for Internal Reconciliation

- Daily/weekly check in between Business Office and Financial aid office
 - Disbursements reported = disbursements posted?
 - Draws and returns of funds match disbursements
 - Does school banking information match G5 data
- Return funds appropriately to the correct program and award year
 - Electronically to G5
 - Adjustments only to correct errors





Tips for Internal Reconciliation

- Time frame for returning unclaimed funds (stale dated checks) no later than 240 days from the date check issued
 - 34 CFR 668.164(h)





Returning Funds

- Return of funds through G5 should be made electronically
 - Set up a "refund" bank account through G5
 - G5 hotline 888-336-8930
- If funds are being returned through G5 for regulatory reasons schools MUST send downward disbursement adjustments for Pell Grant and Direct Loan Program awards*

*For Grant programs, though money must still be returned, disbursement changes cannot be submitted after funding for the award year has been "canceled"





Returning Funds

- Reminder!
 - If returning funds from an audit or program review liability follow directions per the Final Audit or Program Review Determination letter
- Reminder!
 - DL 120 day rule does not apply when returning funds due to regulatory or statutory requirements



Returning Funds

- If <u>exceptiona</u>l circumstance require that you must return FSA funds via paper check
 - Note that there are TWO DIFFERENT addresses, one for Grants and one for Direct Loans
 - Please see sidebar instructions 2012-13 FSA Handbook Volume IV page 4-68
- Adjustments to Campus Based Funds
 - Amend FISAP
 - Return funds through G5
 - 2012-13 FSA Handbook Volume IV page 4-71
 - NO adjusting of funds between awards on G5
 - http://ifap.ed.gov/eannouncements/062812G5System ChangeCampusBaseProgAwards.html



Reconciliation Tips

- Pay Attention to IFAP announcements and COD updates regarding funding reductions
- Once you have confirmed that Business office and Financial aid office records match (internal reconciliation) then...
- Begin the regular and at least monthly external reconciliation with COD and G5
- Daily/weekly monitor edit code rejects
 - Rejected disbursements: DL-unsubstantiated cash, Pell/Teach- no funding
- COD and G5 web screens
- COD and G5 reports



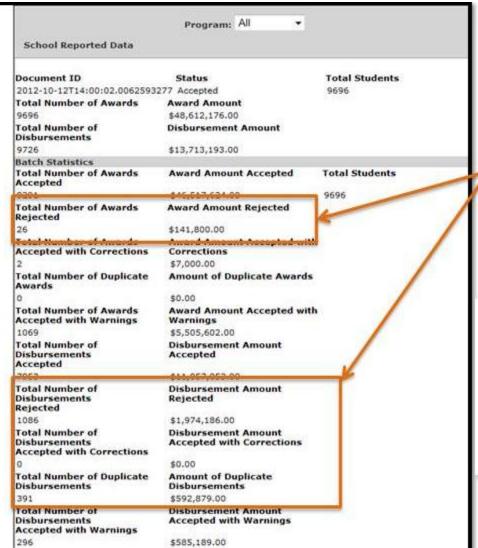


Edit Code Rejects/Warnings

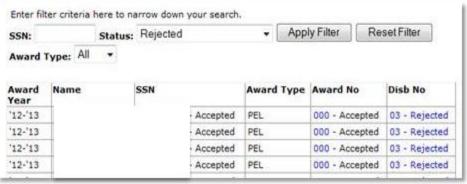
- Warning edits alert you to a potential problem
- Edit rejects do not build on the COD system
- Monitor rejects by batch import results or by batch
- Set aside time to resolve edit code rejects daily/weekly
- Rejected Direct loan data can lead to unsubstantiated cash for advance funded schools
- Rejected Pell Grant and Teach records will not increase available funds in G5



Celebrating Yesterday's Achievements, Shaping Tomorrow's Aspirations



- Search for batches by date range or SSN
- Pay attention to award and disbursement # rejected
- Also monitor duplicate records
- Scroll down and filter by rejects





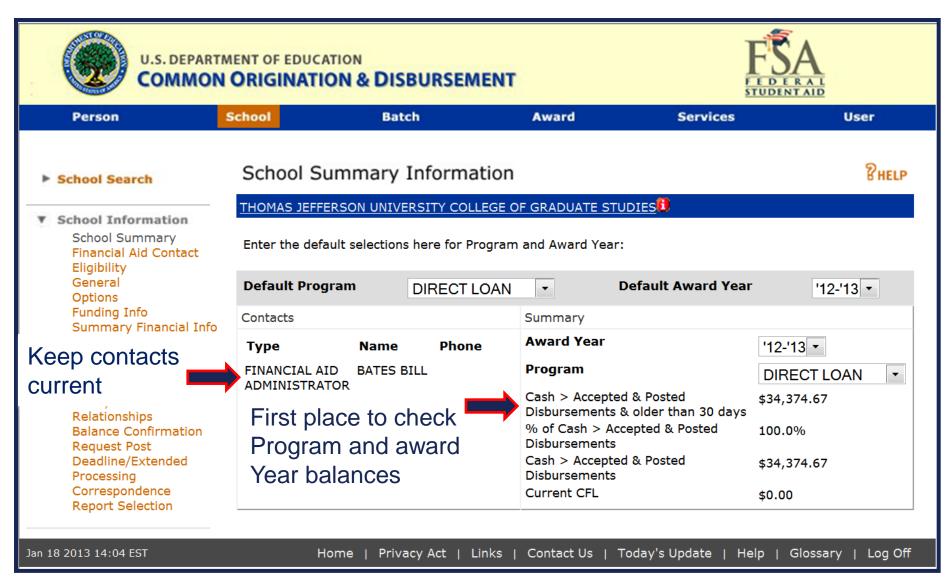


COD and G5 Web Screens

- COD
 - School menu/School Summary Information
 - School menu/School funding Information
 - School menu/Request Post deadline/ Extended Processing
 - Batch menu/Grant data request
 - Batch menu/action queue
- G5
 - External award activity report

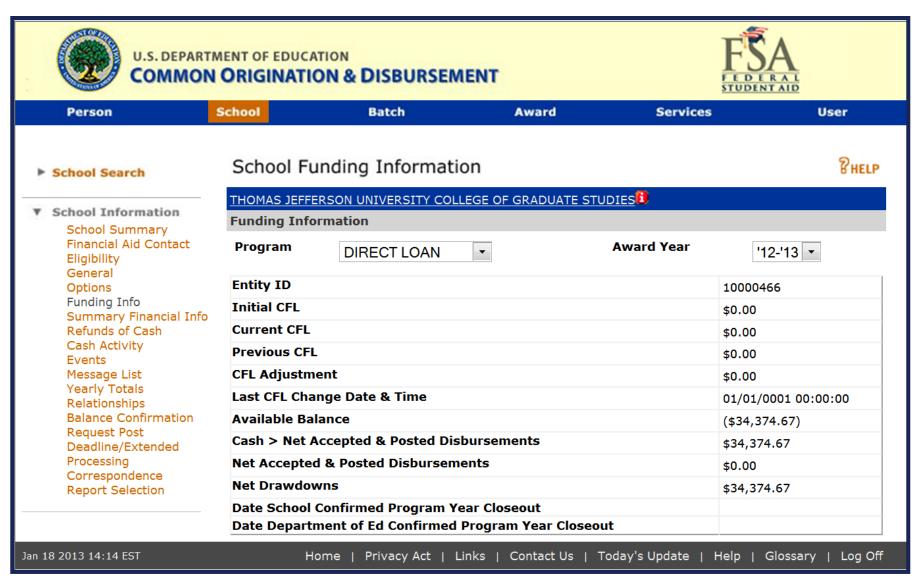


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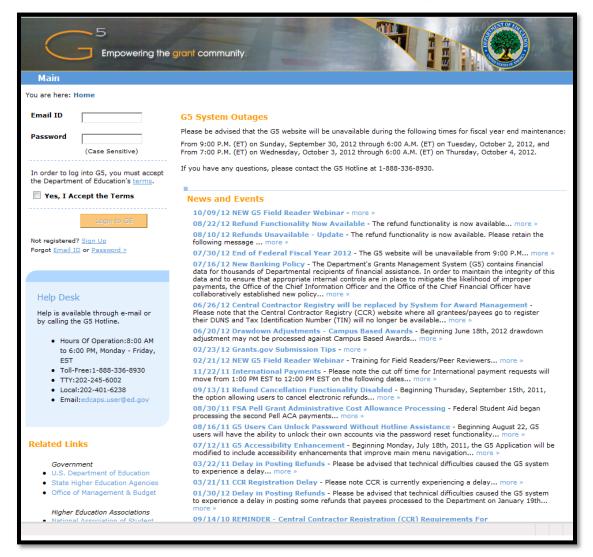


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Person :	ichool		Batch		Award			Ser	vices	User	
Batch Search	Acti	on Queue	List								BHELP
Action Queue	Scho	ol						ı	Disb. Start	Date Disb. E	nd Date
Grant Data Requests									10/18/2012	01/18/	2013
PLUS App Rsp Request	Filter by Status Filter by SSN		All	Filter by Program Type All				All			
FAC Rsp Request	racer	Dy SSN			iter by tas	t wanne	- 1				
Rebuild Search							FIL	TER	RESET		
Should the	4110.55	ds 1 to 2 of 2 tName	SSN	School Enrollment Code	Prog.	Award Year			Disb. Amt.	Disb. Date	Status
disbursements	Е	PAGENKOPF, DANIELE		00046600	DLUNSUB	'12- '13	1	01	\$990.00	11/04/2012	Pending
nave been made?		PAGE, DANIELLE		00046600	TEACH	'12- '13	1	01	\$4,000.00	11/04/2012	Pending
Reduced to \$0?	Records 1 to 2 of 2			otal Disb. Amount: \$4,990.00				0			



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Read only access is available for financial aid administrators

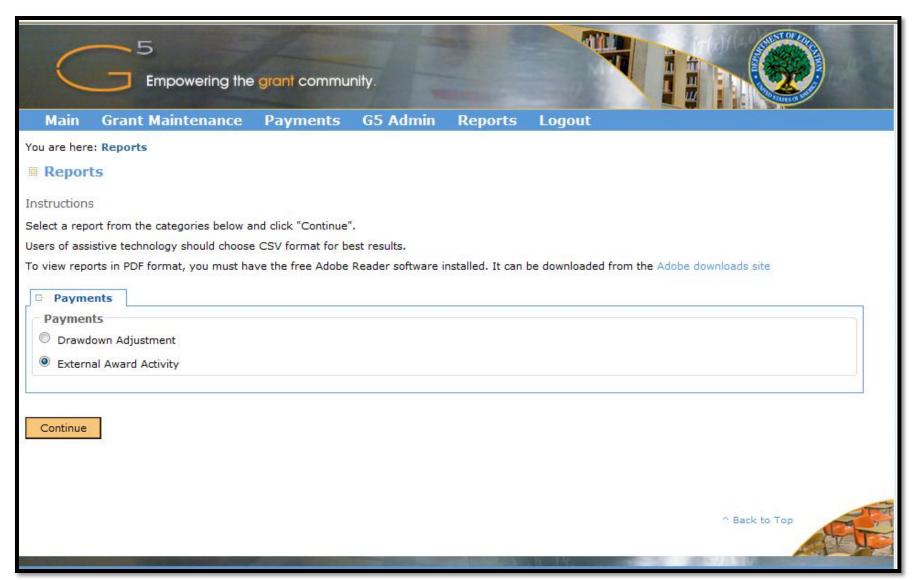
Use G5 to draw and refund cash

Monitor draws and refunds

Does NOT contain disbursement level data.

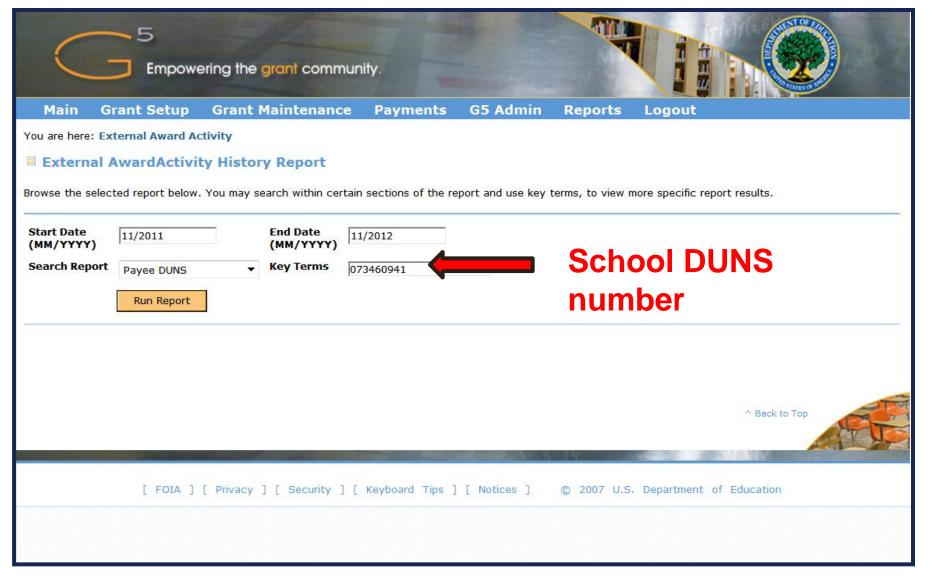


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G5 Award Numbers

G5 Award Numbers are program and award year specific

Direct Loan

TEACH

Pell

IASG

Campus Based

P268K13####

P379T13####

P063P12####

P408A12####

FWS: P033A12####

SEOG: P007A12####

Trailing Year

Trailing Year

Leading Year

Leading Year

Leading Year



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	U.S. Department of Education - EDCAPS GS GS - External Award Activity History Report As of Hon Oct 15 10:13:15 EDT 2012										
Award No.	Recipient Reference No	Net Authorizations*	Iotal Draws	Lotal Refunds	Total Returns	Net Adjustments**	Net Draws***	Lost Date to Draw Funds	Current Available Balance		
P375A106	ACG1011	\$68,512.00	-\$68,024.00	\$0.00	\$0.00	-\$487.00	-\$68,511.00	10/31/2016	\$1.00		
P375A09(ACG0910	\$56,720.00	-\$57,208.00	\$0.00	\$0.00	\$488.00	-\$56,720.00	11/02/2015	\$0.00		
P375A06(ACG0809	\$0.00	-\$1,100.00	\$0.00	\$0.00	\$0.00	-\$1,100.00	10/31/2014	\$0.00		
P268K13(\$1,294,729.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	01/02/2018	\$1,294,729.00		
P268K12/	DirectLoan1112	\$3,448,757.00	-\$2,155,000.00	\$0.00	\$0.00	\$0.00	-\$2,155,000.00	01/31/2017	\$1,293,757.00		
P268K11	DirectLoan1011	\$3,448,757.00	-\$3,429,533.00	\$0.00	\$0.00	-\$19,224.00	-\$3,448,757.00	02/01/2016	\$0.00		
P268K100	DirectLoan0910	\$2,140,061.00	-\$2,570,621.00	\$0.00	\$0.00	\$19,224.00	-\$2,551,397.00	12/31/2014	\$0.00		
P268KQ95	DirectLoan0809	-\$4,727.00	-\$20,153.00	\$0.00	\$0.00	\$0.00	-\$20,153.00	12/31/2013	\$0.00		
P268K081	DirectLoan0708	-\$700,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	03/31/2014	\$0.00		
P268K04I	DirectLoan0304	-\$150,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00		
P268K03I	DirectLoan0203	-\$1,200,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00		
P268K02;	DirectLoan0102	\$84,775.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00		
P268K01	DirectLoan0001	-\$2,937,354.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00		
P268K00;		-\$50,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	07/02/2001	\$0.00		
P116G10	VETS1013	\$399,999.00	-\$229,972.00	\$0.00	\$0.00	\$0.00	-\$229,972.00	12/31/2013	\$170,027.00		
2063011		\$25,385.00	-\$25,385.00	\$0.00	\$0.00	\$0.00	-\$25,385.00	10/30/2017	\$0.00		
P063Q10		\$26,650.00	-\$26,650.00	\$0.00	\$0.00	\$0.00	-\$26,650.00	10/31/2016	\$0.00		
P063Q09		\$21,075.00	-\$21,075.00	\$0.00	\$0.00	\$0.00	-\$21,075.00	11/02/2015	\$0,00		
1002000	PELLACA0809	\$180.00	-\$180.00	\$0.00	\$0.00	\$0.00	-\$180,00	10/31/2014	\$0.00		
20632126	PELL1213	\$2,639,610.01	-\$1,945,000.00	\$0.00	\$0.00	\$0.00	-\$1,945,000.00	10/30/2018	\$1,182,305.0		
P063P11(PELL1112	\$14,514,617.84	-\$14,105,000.00	\$0.00	\$0.00	\$0.00	-\$14,105,000.00	10/30/2017	\$409,617.84		
P063P10(PELL1011	\$16,192,439,00	416 112 504 00	40.00	\$0.00	-\$24.910.00	416 137 414 nn	10/31/2016	\$55,025,00		
P063P09(PELLO910	\$7,161,023.00	-\$9,672,382.00	\$0.00	\$0.00	\$23,764.00	-\$9,648,618.00	11/02/2015	\$0.00		
P063P084	PELL0809	-\$10,528.00	-\$300,408.94	\$0.00	\$0.00	50.00	-\$300,408,94	10/31/2014	\$0.00		
P063P070	PELLO708	-\$9,512.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	10/31/2013	\$0.00		
P033A12	FWS1213	\$193,327.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	10/01/2018	\$193,327.00		

Notice all awards related to this school's duns number

Also note the available balance for the Pell 2009-10 award year



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Award Transaction History

Total: 75

<u>Transaction Date</u>	Change In Authorization	<u>Drawdowns</u>	Refunds	Adjustments	Returns	<u>Offsets</u>
07/09/2012	\$676.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
07/09/2012	-\$676.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
07/09/2012	\$0.00	\$0.00	\$0.00	\$676.00	\$0.00	\$0.00
03/15/2012	-\$19,737.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
03/15/2012	-\$676.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
03/15/2012	-\$480.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
03/14/2012	\$0.00	-\$676.00	\$0.00	\$0.00	¢0.00	\$0.00
07/28/2011	\$0.00	\$0.00	\$0.00	\$20,893.00	\$0.00	\$0.00
03/16/2011	\$0.00	\$0.00	\$0.00	\$2,195.00	\$0.00	\$0.00
03/16/2011	-\$2,195.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
03/16/2011	\$2,195.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
12/06/2010	-\$480.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
12/06/2010	-\$2,195.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
10/05/2010	\$0.00	-\$133,441.00	\$0.00	\$0.00	\$0.00	\$0.00
09/28/2010	\$480.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Pell 2009-2010

Note the amount of activity. This award year was supposed to be closed September 30, 2010.



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Pell COD Reports

COD Reports

Below is a summary of all Pell Grant reports and available formats generated by the COD System.

Format and Delivery Methods			Data R	equest	SAIG Mailbox				COD Reporting Web Site		
					natted	± ₽	p _i	ength		ا- عط	
Report Name	Sort	Frequency	Batch	Web	Preformatted Text	Comma- Delimited	Pipe- Delimited	Fixed Length	PDF	Comma- Delimited	
Electronic Statement of Account (ESOA)		System Generated ¹ or By Request	Ø	©				(
Multiple Reporting Record (MRR)	SSN	Daily	Ø	Ø				Ø			
Reconciliation Report	SSN	By Request	Ø	Ø				Ø			
Year-to-Date (YTD) file	SSN	By Request	Ø	Ø				Ø			
SSN/Name/Date of Birth Change Report – Pell, ACG, National SMART Grant	Last Name	Weekly ¹			Ø					Ø	
Pending Disbursement List	Last Name	Weekly			Ø					(
Verification Status Report	Name	Monthly	Ø	Ø	Ø					Ø	
Pell POP Report	Last Name	Weekly	Ø	Ø	Ø					Ø	
Pell Lifetime Eligibility Used 2012-2013 Report	SSN	Weekly								Ø	

^{1.} If triggered by change





Pell COD Reports

- COD School monitoring report
 - Available weekly through SAIG and on the COD school newsbox
 - Number of Pell POPS
 - Unsubstantiated cash (positive values only) by program and award year
 - % of disbursement records reported timely
 - Will display in both the Pell and Direct Loan Newsboxes



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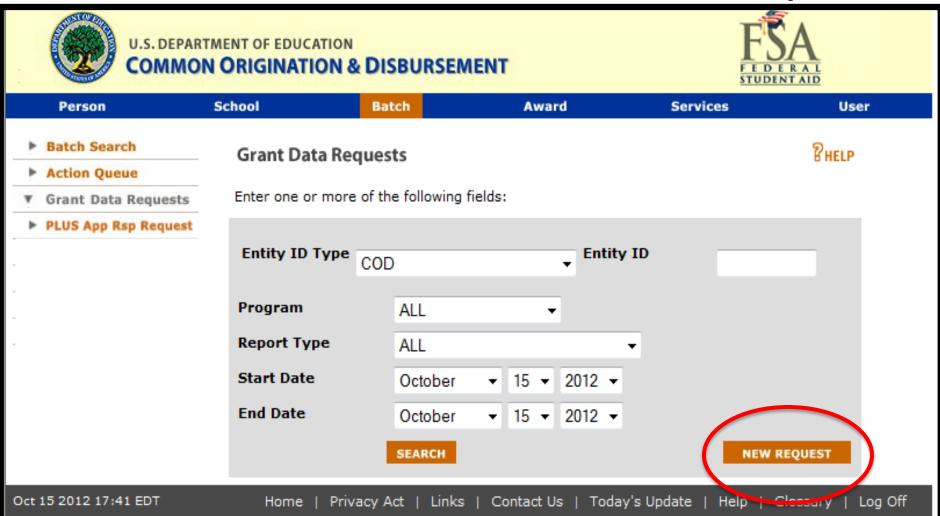
Pell COD Reports

- Electronic Statement of Account (ESOA SAIG)
 - Assist in monitoring of cash
- Reconciliation Report (SAIG)
 - Summary disbursement level data
- Year-To-Date File (YTD SAIG)
 - Disbursement level data
- Multiple Reporting Record (MRR SAIG)
 - Data request or COD generated and sent
- Pell POP Report (NewsBox & SAIG)
 - Resolve POPs before FSA reduces all disbursements to zero and reduces funding



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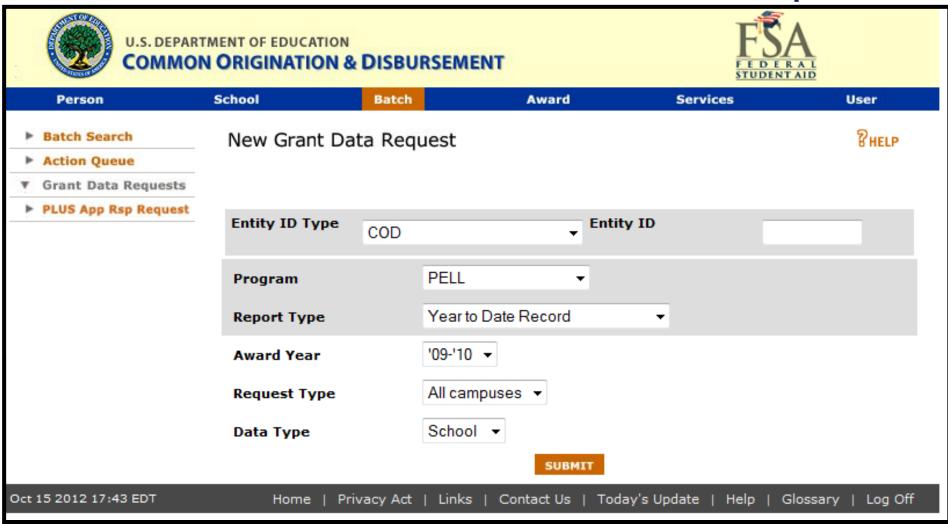
COD Web Screens - Grant Data Request





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COD Web Screens - Grant Data Request





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Direct Loan COD Reports

		Format and Delivery Methods					SAIG Mailbox				
					nited	, a		bute		mited	
Report Name	Report Selection Web Page	Sort	Frequency	Preformatted Text	Preformated	Comma-Delimited	Pipe-Delimited	Fixed Length	Do Not Distribute	ğ	Comma-Delimited
30-Day Warning Report	②	Award ID	Monthly	*	②	②		②		8	
Direct Loan Rebuild File	Separate Direct Loan Rebuild Page	SSN	By Request ¹				0				
Duplicate Student Borrower Report	©	SSN	Monthly	*	②			②		3	
Inactive Loans Report		Award ID	Monthly	*							
Pending Disbursement Listing Report	Ø	Last Name	Weekly	*	②	②		②		3	
School Account Statement (SAS)	Link to Separate SAS Page	SSN	Monthly		Ø	Ø	*				
SSN/Name/Date of Birth Change Report	©	SSN	Weekly ²	*	②	②		②			
MPN Discharge Report		Last Name	Weekly		②		*	İ			
Expired MPN Report	②	Last Name	Weekly		②	②	*			8	
MPNs Due to Expire		Last Name	Monthly				*				
Direct Loan Counseling Report (Note: This report only contains information from StudentLoans.gov)	Ø	SSN	Weekly							Ø	
Direct Loan Actual Disbursement List	©	SSN	Weekly		②		İ	②			
Completed MPN Report	(2)	SSN	Weekly				Ĺ	Ĺ			

Pending disbursement list

Direct Loan
Actual
disbursement list

School Account Statement



Direct Loan COD Reports

- Pending Disbursement List (SAIG and COD web)
 - Identifies pending disbursements that should be actual disbursements, or that should be reduced to \$0
 - Consider using the Action Queue to run ad Hoc pending disbursement lists
- Actual Disbursement List (SAIG and COD web)
 - Monitor to ensure actual accepted disbursements and amounts match what was posted to student accounts
 - On a weekly basis
- School Account Statement (SAS) (SAIG only)
 - Generated monthly
 - Provides the official Ending Cash Balance (ECB)





Direct Loan School Account Statement

- Generated the first full weekend of the month and reflects data up to the end of the previous
- You MUST reconcile monthly to the balances reflected on the SAS and MUST document that you have done so
- Composed of 4 Sections
 - Cash summary
 - Cash detail
 - Disbursement Summary by loan type
 - Loan detail, loan level or detail disbursement activity level



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Fixed Length
YTD
works best with
most
school software

YTD helpful for final end of year reconciliation

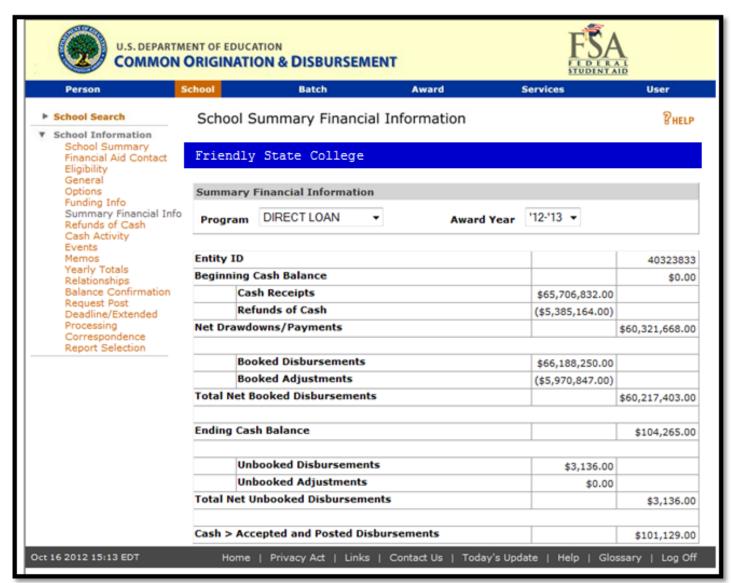


Cash Summary

- Reflects monthly and year to date draws/refunds and disbursement/adjustment SUMMARY level data
- If cash and disbursement summary totals match your FAA and Business Office records you are done - document for that month
- If the total's don't match due to timing differences with cash draws or refunds, or disbursements that have not yet posted in COD you are done – document for that month
- If neither you can move on to the cash detail or loan detail sections



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Mirrors the SAS cash summary layout but updates daily

Great way to monitor your daily cash and disbursement activity at the summary level



SAS Detailed Reports

- Use the Cash detail to ensure that cash and refunds post to the correct award year
- Use the loan detail, either loan level or disbursement level, to ensure that what is accepted on COD matches exactly to what is reflected in your school data
 - Both disbursement dates and amounts reported in COD must match what was posted to student accounts
- Direct Loan Tools
 - Can be used with all school software to compare the SAS to school records or print/view the SAS reports
 - Download for free from www.fsadownload.ed.gov



What's Ahead

- No Direct Loan initial funding authorization for HCM1 schools
 - Records first
 - HCM1 schools submit actual disbursement records up to 7 days in advance of disbursement date in order to generate a CFL and establish an available G5 balance
 - Same as Pell Grant and Teach Grant process
- New look for Grant data and DL report requests
- SAS Disbursement Detail on Demand
 - Available for both Direct Loans and Teach
 - Available with COD new award year release March 2013





Reconciliation Resources

- FSA handbook- Volume 4
- COD technical reference
 - Implementation guide, edit code rejects, reports, DL tools
- Blue Book
 - http://ifap.ed.gov/ifap/BlueBook.jsp?year=2013
 - Volumes 1 7 available now



Reconciliation Resources

- IFAP announcements- you must monitor IFAP to be considered administratively capable
 - Detailed recorded training materials available
- COD reconciliation team- contact via the main school services number 800-848-0978 or 800-474-7268
- Federal Loan School Support Team (FLSST)
 - dlops@ed.gov



Celebrating Yesterday's Achievements, Shaping Tomorrow's Aspirations

QUESTIONS?



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