



NOVEMBER 2021 NEWSLETTER

IMPORTANT DATES:

November 2

Get out and Vote!

November 3

DJA Webinar
Program Integrity, Audits and
Program Reviews
11:00 a.m. CST

November 7

Day Light Savings

November 11

Veteran's Day



November 25 & 26

Thanksgiving - DJA Closed



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October has passed and so has the FISAP submission deadline. However, November is an equally busy month and we still have a few more deadlines approaching before the end of 2021. On the 11th we will honor and celebrate all the veterans who have served for our country. Please note that Veteran's Day will result in the closure of all government offices and may have an impact on your Title IV processing. Please also note the upcoming deadline to for TG Confirmation of December 10, 2021.

Have you had a chance to attend our monthly webinars? These webinars are designed to keep you up to date on current regulations and requirements that will help your school stay in compliance. DJA monthly webinars begin at 11:00 a.m. CST, on the first Wednesday of each month, and normally last about an hour. We have two webinars left before wrapping up our 2021 series. This month we will present on Program Integrity, Audits and Program Reviews and next month on 1098-T reporting.

In celebration of the Thanksgiving Holiday and so our team can spend time with their families, DJA will be closed on Thursday, November 25th and Friday November 26th for the Thanksgiving Holiday. We wish each and every one of you a Happy Thanksgiving!

Happy Thanksgiving!

*Thank you and until next time, stay safe!
Deborah John, President*



IN THE NEWS: U.S. DEPARTMENT OF EDUCATION TO ESTABLISH AN ENFORCEMENT OFFICE WITHIN FEDERAL STUDENT AID

In October, the U.S. Department of Education announced the establishment of an Office of Enforcement within Federal Student Aid, reporting directly to the chief operating officer. The Office of Enforcement will strengthen oversight of and enforcement actions against postsecondary schools that participate in the federal student loan, grant, and work-study programs. This recent action restores an office that was first established in 2016, but deprioritized in the previous administration.

"Vigorously ensuring that schools are adhering to the federal student aid program rules and delivering quality education to students is critical in America's ability to build back better," said Under Secretary James Kvaal. "The Administration will prioritize Federal Student Aid's effective oversight and enforcement of postsecondary schools."

The Enforcement Office will be led by Kristen Donoghue, as the chief enforcement officer, who will report directly to FSA Chief Operating Officer Richard Cordray. Donoghue joined FSA in July as a senior advisor to the chief operating officer, bringing a wealth of enforcement and leadership experience. Donoghue previously served as the enforcement director of the Consumer Financial Protection Bureau (CFPB), where she led a 140-person office responsible for enforcement of federal consumer financial laws covering a range of financial services companies including the largest banks in the country.

Under her leadership, the CFPB pursued hundreds of investigations and filed numerous significant public enforcement actions, including obtaining the highest civil money penalty in the CFPB's history, a \$1 billion fine against Wells Fargo. Most recently, Donoghue served as a managing vice president at Capital One Bank, where she headed a team focused on legal and regulatory compliance.

The Enforcement Office will proactively identify and address major problems across institutions that pose widespread risks to students and taxpayers. The office will work closely with the Partner Participation and Oversight Office on a risk-based approach to oversight and compliance. It will comprise four existing divisions:

- **Administrative Actions and Appeals Services Group:** This group fines, limits, suspends, terminates, and imposes emergency actions against postsecondary institutions that participate in the federal student aid programs. The group also issues actions, such as revocations and recertification denials; initiates debarment and suspension proceedings against individuals and other parties; and resolves appeals of final audit and program review determinations.
- **Borrower Defense Group:** This group analyzes borrower defense to repayment claims and recommends appropriate dispositions to Department leadership. The group communicates with postsecondary institutions about borrower defense claims and coordinates across FSA and with investigative and enforcement divisions of federal and state agencies related to individual borrower defense claims.
- **Investigations Group:** This group evaluates indicators of potential misconduct or high-risk conduct by postsecondary institutions and third-party servicers, and investigates institutions' compliance with federal laws, regulations, and the terms of program participation. This group will collaborate with other



agencies that have complementary enforcement resources, such as the Department of Justice, Consumer Financial Protection Bureau, Federal Trade Commission, and state attorneys general.

- **Resolution and Referral Management Group:** This group tracks and resolves referrals, reports of suspicious activity, allegations, and complaints about institutions and individuals that participate in the federal student aid programs. FSA receives feedback from sources that include the general public; students; school officials; individuals within FSA and the Department; and external oversight and higher education stakeholders, such as the Department's Office of Inspector General, U.S. Department of Defense, U.S. Department of Veterans Affairs, and Consumer Financial Protection Bureau.

As part of FSA's heightened enforcement activities and actions to uphold civil law and promote borrower protection, FSA will coordinate with other state and federal partners. In particular, FSA plans to work closely with the Federal Trade Commission, which earlier this week announced a major shift in its enforcement priorities to focus on postsecondary schools that illegally engage in unfair and deceptive acts or practices.

"The Department of Education has critical oversight responsibilities over the integrity of the benefit and student loan programs under Title IV of the Higher Education Act," said FTC Commissioner Rohit Chopra. "By working more closely together, FTC investigations can assist the Department of Education in taking additional administrative actions against those that violate the law."

This recent announcement follows actions the Biden-Harris Administration has taken to protect students and taxpayers from poor-performing programs, including:

- Approving 100% borrower defense discharge, totaling more than \$556 million, for students harmed by ITT Institutes, Westwood College, Marinello Schools of Beauty, and the Court Reporting Institute.
- Revising the Department's position on preemption of state oversight to foster closer coordination and joint action between FSA and state officials, which ensures stronger protections for fair treatment of students, parents, and borrowers.
- Resolving liabilities identified in program review and audit determination of postsecondary institutions, totaling more than \$4.1 million.
- Denying the application of Florida Coastal School of Law to resume its participation in the federal student loan program.
- Initiating actions against school executives who failed to put students' interests first. And,
- Elevating the FSA ombudsman to report to FSA's chief operating officer to put more focus on the voice of the customer and FSA's commitment to taking actionable steps to improve customers' experiences and outcomes with the federal student aid programs.

Additionally last month, the Department held the first session of negotiated rulemaking sessions focused on college affordability and student loans. The rulemaking committee is expected to address issues affecting student loan borrowers, including borrower defense to repayment for students harmed by their colleges' misleading practices, recovering from institutions the amount of relief granted to borrowers under a successful borrower defense claim, closed school discharge, and pre-dispute arbitration.

[U.S. Department of Education to Establish an Enforcement Office Within Federal Student Aid | U.S. Department of Education](#)



IN THE NEWS: U.S. DEPARTMENT OF EDUCATION ANNOUNCES TRANSFORMATIONAL CHANGES TO THE PUBLIC SERVICE LOAN FORGIVENESS PROGRAM, WILL PUT OVER 550,000 PUBLIC SERVICE WORKERS CLOSER TO LOAN FORGIVENESS

The U.S. Department of Education also announced last month an overhaul of the Public Service Loan Forgiveness (PSLF) Program that it will implement over the next year to make the program live up to its promise. This policy will result in 22,000 borrowers who have consolidated loans—including previously ineligible loans—being immediately eligible for \$1.74 billion in forgiveness without the need for further action on their part. Another 27,000 borrowers could potentially qualify for an additional \$2.82 billion in forgiveness if they certify additional periods of employment. All told, the Department estimates that over 550,000 borrowers who have previously consolidated will see an increase in qualifying payments with the average borrower receiving another two years of progress toward forgiveness. Many more will also see progress as borrowers consolidate into the Direct Loan program and apply for PSLF, and as the Department rolls out other changes in the weeks and months ahead.

“Borrowers who devote a decade of their lives to public service should be able to rely on the promise of Public Service Loan Forgiveness. The system has not delivered on that promise to date, but that is about to change for many borrowers who have served their communities and their country,” said U.S. Secretary of Education Miguel Cardona. “Teachers, nurses, first responders, servicemembers, and so many public service workers have had our back especially amid the challenges of the pandemic. Today, the Biden Administration is showing that we have their backs, too.”

The changes announced include:

A limited PSLF waiver that allows all payments by student borrowers to count toward PSLF, regardless of loan program or payment plan. This waiver will allow student borrowers to count all payments made on loans from the Federal Family Education Loan (FFEL) Program or Perkins Loan Program. It will also waive restrictions on the type of repayment plan and the requirement that payments be made in the full amount and on-time for all borrowers. To receive these benefits, borrowers will have to submit a PSLF form by October 31, 2022, which is a single application used to certify employment and evaluate a borrower for forgiveness.

Borrowers who currently have FFEL, Perkins, or other non-Direct Loans, will get the benefit of this limited waiver if they apply to consolidate into the Direct Loan program and submit a PSLF form by October 31, 2022. The waiver applies to loans taken out by students.

Allowing active duty service members to count deferments and forbearances toward PSLF. This solves a problem for service members who have paused payments while on active duty but were not getting credit toward PSLF.

Automatically providing credit toward PSLF for military service members and federal employees using federal data matches. The Department will implement data matches next year to give these borrowers credit toward PSLF without an application.



Reviewing denied PSLF applications for errors and giving borrowers the ability to have their PSLF determinations reconsidered. These actions will help identify and address servicing errors or other issues that have prevented borrowers from getting the PSLF credit they deserve.

These changes represent a significant step in the Department's efforts to transform the PSLF Program. The Department is exploring additional steps, such as partnerships with employers, to continue to make this process easier for borrowers. Last week, the Department released materials for the first session of negotiated rulemaking, including proposals to make lasting changes to make it easier for borrowers to make progress toward PSLF.

Federal Student Aid will make more information available to borrowers at [StudentAid.gov/PSLFWaiver](https://studentaid.gov/PSLFWaiver). In the coming weeks and months, the Department will communicate directly with borrowers about these changes to PSLF to help borrowers understand how they may benefit and any actions they may need to take. Borrowers should ensure that they have accounts on StudentAid.gov and that their contact information there is up to date.

Including the borrowers eligible for immediate forgiveness under these actions, the Biden-Harris Administration has now approved more than \$11.5 billion in loan cancellation for over 580,000 borrowers.

[U.S. Department of Education Announces Transformational Changes to the Public Service Loan Forgiveness Program, Will Put Over 550,000 Public Service Workers Closer to Loan Forgiveness | U.S. Department of Education](#)

OFFICE FOR CIVIL RIGHTS RELEASES FACT SHEET ON SUPPORTING INTERSEX STUDENTS

In October in recognition of Intersex Awareness Day (October 26th), the U.S. Department of Education's Office for Civil Rights issued a fact sheet, [Supporting Intersex Students: A Resource for Students, Families, and Educators](#).

Federal civil rights laws protect all students, including intersex students, from sex discrimination. OCR recognizes that intersex students may face challenges to fully and equally participating in school.

The fact sheet lists key issues intersex students face in schools, including bullying, harassment, or other discrimination related to their physical characteristics or because they do not conform to sex stereotypes. The resource offers suggestions on ways schools can best support intersex students, such as using inclusive language in school mission statements and affirming students' rights to be free from all forms of sex discrimination at school. The fact sheet also includes steps to take if students believe that they, or others, have been discriminated against at school based on sex.

Today's release builds on the Biden-Harris Administration's and OCR's efforts to ensure equal educational opportunity for all students. We encourage you to read and share today's fact sheet.

For more information and resources, please see [OCR's Resources for LGBTQI+ Students](#).



VETERANS DAY FEDERAL HOLIDAY PROCESSING

DJA will be open and continue to process, but because Veterans Day is a federal holiday, federal offices as well as some Title IV processors and contact centers will be closed on Thursday November 11, 2021. Central Processing System (CPS) will accept data on Thursday November 11, 2021; but will not process data or send Institutional Student Information Records (ISIRs) until Friday, November 12, 2021.

The Common Origination and Disbursement (COD) System will accept and process data from schools and send back responses/acknowledgments on Thursday the 11th, but schools will not be able to receive any federal funds on that day. Requests for changes in funding levels and for funds will not be processed until Friday, November 12, 2021.

ACTIVE CONFIRMATION OF TG NUMBERS (SAIG MAILBOXES) AND ELECTRONIC SERVICES USER ACCOUNTS REQUIRED BY DECEMBER 10, 2021

Every organization enrolled for a Student Aid Internet Gateway (SAIG) account is required to review and validate its assigned TG numbers and Electronic Services user accounts by **December 10, 2021**. This includes TG numbers (SAIG Mailboxes) with access to the [NSLDS Professional Access](#) website, the [COD Web Site](#), and all [FAA Access to CPS Online](#) and EDconnect user accounts. It also includes TG numbers enrolled for SAIG batch services for the National Student Loan Data System (NSLDS[®]), the Central Processing System (CPS), the Common Origination and Disbursement (COD) System, and the Financial Management System (FMS).

Note: To perform the active confirmation process, every Primary Destination Point Administrator (DPA) at an organization must follow the steps outlined below for both the organization's SAIG mailboxes (Destination Points/TG numbers) *and* Electronic Services accounts. **It is a two-step process.**

Failure to accurately complete this process by December 10, 2021 will result in loss of access to Federal Student Aid data systems, including services such as Institutional Student Information Record (ISIR) deliveries, ISIR requests, Free Application for Federal Student Aid (FAFSA[®]) corrections, and NSLDS enrollment reporting and updates.

Important Reminders:

- Every organization must review the services associated with each of its SAIG mailboxes (Destination Points/TG numbers) and Electronic Services accounts and provide active confirmation that enrolled staff continue to require their access to each listed service or system. It is a serious security violation to confirm access to a service or system if the individual no longer requires it. Similarly, an individual who



no longer requires professional access to any Federal Student Aid data system, or who is no longer employed by the organization, **must** be deleted from the organization's list.

- Third party servicers are also required to validate their organization's SAIG mailboxes and Electronic Services accounts. Failure to do so will mean client schools risk losing access to batch services. Schools must work with their third party servicer to ensure the validation process is completed to avoid disruption in reporting services with Federal Student Aid data systems.

The Primary DPA of the primary TG number (Destination Point/mailbox) must perform all of the steps to provide active confirmation for 1) the organization's SAIG mailboxes (Destination Points/TG numbers) (**FIRST STEP**) and 2) the organization's Electronic Services accounts (**SECOND STEP**).

The steps required and critical information can be found in this electronic announcement at:

[Active Confirmation of TG Numbers \(SAIG Mailboxes\) and Electronic Services User Accounts Required by Dec. 10, 2021 to Maintain Access to Federal Student Aid Systems | Knowledge Center](#)

Contact Information

If you have questions, contact CPS/SAIG Technical Support at 800/330-5947 (TDD/TTY 800/511-5806) or by email at CPSSAIG@ed.gov.

DJA Clients: DJA has validated all services attached to DJA's SAIG mailboxes and all users with access under DJA. You are reminded that your school's DPA is responsible for all services/users attached to the school's SAIG mailbox.

2022-23 FAFSA IS RELEASED

The 2022–23 FAFSA cycle began today. The application is available until June 30, 2023—but be sure to remind your students that some funds are limited, so it is a good idea to apply as soon as possible. Students can apply online via fafsa.gov.

The 2022–23 application is also available on the myStudentAid mobile app. Applicants who choose to use the myStudentAid mobile app to complete a 2022–23 FAFSA form will be presented with a mobile-responsive application on the device of their choice.

For a complete description of all the changes to the 2022–23 FAFSA form, please refer to the [Summary of Changes for the Application Processing System Guide](#), which was posted to the Federal Student Aid (FSA) Knowledge Center Aug. 18.

Updated FAFSA Resources

FSA staff members have been busy updating FAFSA resources. You'll find FAFSA resources, updates, and talking points on the Financial Aid Toolkit site. For more information about the 2022–23 FAFSA materials and their estimated availability dates, visit the Financial Aid Toolkit's "FAFSA Updates" page.



Remember, the [Financial Aid Toolkit](#) is for the counselor, mentor, or financial aid professional. Send students to StudentAid.gov/fafsa for FAFSA information.

[The 2022–23 FAFSA® Form is Here! | Knowledge Center](#)

AVAILABILITY OF NSLDS ENROLLMENT REPORTING GUIDE

FSA announced the availability of the updated [National Student Loan Data System \(NSLDS®\) Enrollment Reporting Guide](#), a comprehensive document containing step-by-step instructions for NSLDS enrollment reporting. The September 2021 update provides information on new NSLDS functionality and reflects guidance on enrollment reporting that has been published since the guide's last publication (November 2020). Refer to the "What's New?" section at the beginning of the guide for a complete description of all updates.

The updated NSLDS Enrollment Reporting Guide (September 2021) is available in the [NSLDS User Resources](#) section of the Knowledge Center website.

COMPLIANCE CORNER

ISSUING FINANCIAL AID OFFERS- WHAT INSTITUTIONS SHOULD INCLUDE AND AVOID

FSA recently released an Electronic Announcement in regards to the best way to handle delivering a Financial Aid Offers. Often, students face a confusing array of options as they consider where to go to college and how to finance their education. Resources like the [College Scorecard](#) and the [College Financing Plan](#) are critical mechanisms for ensuring that students have transparent, clear-cut information about their options. However, many institutions provide supplementary information that is not always clear to students and their families. Alongside the update to the College Financing Plan [published last month](#), the Department is updating its guidance to institutions of higher education about what they should include and avoid when issuing financial aid offers:

1. **Avoid calling your financial aid offer an “award” and avoid calling it a “letter.”** Loans are not awards. Work-study is not an award; it is the potential for employment that offers earnings to students. Using a term like “financial aid offer” is clearer. Given that many institutions deliver these offers via electronic communication, calling them “letters” can also be confusing; “offers” provides clearer terminology for students.
2. **Always include cost of attendance in a financial aid offer.** For any student and/or family to be able to make an informed decision, the amount of aid received must be compared to the total cost of attendance in order to determine the student/family financial contribution. If financial aid offers exclude the total cost of attendance, students and families will be unable to contextualize the offer.
3. **Break down cost of attendance in ways that help students understand costs.** For students and families to be able to plan how to cover costs, the provided cost of attendance needs to be transparent



about what is and is not included, and what is a fixed cost and what is an estimated cost. Break out individual components of the cost of attendance including tuition and fees, housing (on-campus and off-campus), and meals. Other key costs, such as books, supplies, medical insurance, and transportation, also need to be included so that students and families can consider them as they determine if a school is a financial fit for them. Institutions should also clarify whether the cost of attendance is based on enrollment of a full- or part-time student, and whether tuition and other expenses are for an in-state or out-of-state student, if applicable.

4. **List grants and scholarship aid, loans, and Federal Work-Study separately.** Listing grant and/or scholarship aid, loans, and Federal Work-Study separately will help students and families understand the terms and specific requirements of each category. Specifically, listing them separately makes clear what is a grant/scholarship (aid that does not need to be repaid), what is a loan (aid that needs to be repaid), and what constitutes work-study (aid that must be earned by securing a job and working to receive it). Institutions should clearly label each category, and sum the individual line-items within each to provide a total for that category.
5. **Explain and calculate the estimated net cost for students in the financial aid offer.** Net cost is the difference between the total cost of attendance (COA) and all grant/scholarship aid received. Students should be able to easily understand how the calculation was made, and institutions should provide this standard estimate of students' out-of-pocket and debt-financed costs. Excluding net cost is confusing to students and families and makes comparing financial aid offers very difficult, if not impossible. Additionally, institutions should not present the net cost information in ways that may confuse students, such as subtracting private or Parent PLUS loans from the cost of attendance and/or zeroing out the cost with those types of loans.
6. **Separate out other options for repaying the net cost.** Apart from federal student loans, provide a list of other options available to students, which may include tuition payment plans; state, institutional, or private loans; or federal Parent PLUS loans, for which a dependent student's parents may apply, among other possible options. Federal student loans are available to all undergraduate students, are not subject to a credit check or other underwriting, and come with important protections for students and families; the same is often not true of private, institutional, or Parent PLUS loans. Institutions should name these other options separately from federal student loans, without an associated dollar amount for each, noting that students need to separately research the terms and conditions of each.
7. **Describe critical next steps in the financial aid offer.** Especially for first-generation families, the financial aid process can be intimidating, often with deadlines and fees that are not intuitive. Along with the financial aid offer, include the specific next several steps that a student/family should follow to accept or decline financial aid.

The Department feels strongly that doing these things will improve the clarity, transparency, and basic understandability of financial aid offers for students and families. When students and families understand financial aid offers, they make informed decisions that help to increase college enrollment, persistence, completion, and successful repayment of student loans. If your institution does not already, we also urge you to consider adopting the Department of Education's College Financing Plan, which incorporates the principles outlined above. To adopt the CFP, please review the information on this website: <https://www2.ed.gov/policy/highered/guid/aid-offer/index.html>.

[Issuing Financial Aid Offers—What Institutions Should Include and Avoid | Knowledge Center](#)



DJA CALENDAR

Monthly DJA Webinar: *Program Integrity, Audits and Program Reviews - Wednesday, November 3rd - 11 a.m. CDT*

NOTE: There may be a difference between DJA local time and your time zone. To determine your time zone equivalent, click on this link to view a time zone map: <http://www.worldtimezone.com/time-usa12.php>

Webinars are free to clients. There is a \$45 fee for all others who may be interested in joining us for these presentations. Invitations are automatically sent to all clients, however if you do not receive an invitation, email Renee Ford at rford@gotodja.com. After registering, you will receive the log-in information. Questions can be directed to Renee by email or by calling toll free at 1-800-242-0977

CECU Webinar (For CECU Members Only): *Cyber Security - Tuesday, November 16th*

Deborah is presenting an informative webinar on Cyber Security for CECU members on Tuesday November 16th. The session will cover the compliance expectations for higher education institutions in regards to protecting against cyber security attacks, as well as how to prepare an Information Security Program to meet the standards set forth by the Department of Education. CECU members can visit the Member Portal at <https://www.career.org/apps/member/login> to register.

2021 DJA MONTHLY WEBINAR SCHEDULE

NOV 3	Program Integrity (Audits, Program Review)
DEC 1	1098-T Reporting

2021 FEDERAL STUDENT AID (FSA) TRAINING CONFERENCE GOING VIRTUAL November 30- December 2, 2021

This year's FSA Training Conference will feature keynote addresses from Secretary Miguel Cardona and FSA's Chief Operating Officer, Richard Cordray plus 35 engaging sessions on the latest policy and operations from our subject matter experts.

Sessions will feature live Q&A and all sessions will be available on-demand. A resource center will be offered where you can get one on one assistance.



A complete [agenda](#) and [session descriptions](#) are now available.

Registration is NOW OPEN! [2021 Virtual Federal Student Aid Training Conference – Registration Now Open | Knowledge Center](#)

The event platform will open on Nov. 22, in advance of the FSATC, for you to learn how to access and navigate the platform prior to the conference.

Interested in getting training before you attend the FSATC? Visit the [FSA Training Center](#) for your FSA training needs! This free training site includes online courses and recorded presentations to help you administer the programs at your institution.

Disclaimer: The information presented in this Newsletter is provided as a service and represents our best efforts to assist institutions with federal student aid regulations. We have collected information we believe to be important in finding and obtaining the resources for administering federal student aid; however, we assume no liability for the use of this information. The information in this newsletter does not constitute, and should not be construed as, legal advice.

